

Breckland District Council: 5 Year Housing Land Supply Position Statement

November 2019

1. Introduction and context

- 1.1 To support the Government's objective of significantly boosting the supply of housing it is important that a sufficient amount of land can come forward where it is needed and that land with planning permission is developed without unnecessary delays. Housing trajectories are used by Councils to demonstrate that anticipated housing delivery will meet or exceed the housing requirement set out in their Local Plan and also to calculate their five year housing land supply.
- 1.2 The government through the National Planning Policy Framework (NPPF, published in February 2019, paragraph 73) requires that all local planning authorities identify sufficient specific deliverable sites to deliver a minimum of five years' worth of housing against their requirement set out in their adopted development plan (or against local housing need where their requirement is more than five years old). The NPPF (published in February 2019, paragraph 73) also sets out a requirement to provide an additional buffer of 5%, 10% or 20% depending on specific circumstances.
- 1.3 The NPPF (published in February 2019, paragraph 74) provides the potential for the five year supply to be established for a year through a recently adopted Local Plan or Annual Position Statement.

2 The Breckland Local Plan Inspector's Report

- 2.1 The Breckland Local Plan has been found sound by the Planning inspectorate and was subsequently adopted by the Council on November 28th 2019. The base date for the Housing trajectory in the adopted Plan was April 2018.
- 2.2 Subject to the Council agreeing main modifications to the Plan in respect of the housing trajectory paragraph 177 of the Inspector's Report states

'I consider that the Council can demonstrate a five year housing land supply on adoption of the Plan and with the recommended modifications the Plan is sound in relation to this main issue'.

- 2.3 The Inspector notes that the Council has accepted that there has been a persistent history of under delivery of housing and that a 20% buffer should be applied to the five year housing land supply calculation. Additionally, the Inspector considers that that this unmet need should be measured against the objectively assessed housing need figure as set out in the Strategic Housing Market Assessment of 612 dwellings per annum from 2011.
- 2.4 The Inspector considered that the Council should address the previous shortfall in housing delivery since 2011 over the next five years under the 'Sedgefield' method.
- 2.5 It is also worthy of note that the Inspector considers that the Council has been *'very conservative in its windfall allowance' and that consequently 'that the*

Council's five year housing land supply is likely to have improved, albeit probably modestly'. This will be considered as part of the review of the Plan.

3 The Council's Position Statement

Completions

- 3.1 Table 1 below sets out the total completions since 2011. There has been a clear upward trend in completions post-recession, with higher completions figures in recent years. This is a positive indicator of the strength of housing delivery in Breckland going forward. For note there were 753 completions in 2018/2019 that will form part of future calculations on housing land supply. However, as the date in the adopted Local Plan is 2018 this is the date used for the calculation in this Statement.

Year	Actual Completions (net)	Adopted Local Plan Target	Shortfall against Emerging Local Plan (annual)	Shortfall against Emerging Local Plan (cumulative)
2011/2012	342	612	-270	-270
2012/2013	321	612	-291	-561
2013/2014	416	612	-196	-757
2014/2015	486	612	-126	-883
2015/2016	617	612	5	-878
2016/2017	793	612	181	-697
2017/2018	530	612	-82	-779

Shortfall

- 3.2 The shortfall in delivery is 779 dwellings. In accordance with the recommended approach in the Inspectors Report this would need to be addressed over the next 5 years. This increases the annual requirement by 156 dwellings per annum from 612 to an average of 768 dwellings per annum.

Buffer

- 3.3 As noted in paragraph 2.3 above the Inspector includes a 20% buffer as part of his consideration of the Local Plan. The NPPF requires that Local Planning Authorities apply an additional buffer of at least 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. From November 2018 the will be measured against the housing delivery test. Where the Council wishes to demonstrate a five year supply of deliverable sites through a recently adopted Plan a buffer of 10% must be added. If there has been significant under delivery of housing over the previous 3 years (measured

against the Housing Delivery Test¹) the buffer should be 20%. The latest results were published in November 2018

- 3.4 If housing delivery falls short of the housing requirement then a series of measures will apply depending upon the shortfall. If delivery falls below 95% then an Action Plan must be published. If it is below 85% then a 20% buffer should be added to the 5 year supply. Finally if delivery falls below 75% then there is a presumption in favour of sustainable development.
- 3.5 The method for calculating the Housing Delivery Test measurement is set out in the Housing Delivery Test Measurement Rule Book. It is a percentage measurement of the net number of homes delivered against the net number of homes required. Where, as in Breckland's case, the Local Plan is less than five years old then the net number of homes required is the lower of the adopted local plan annual housing requirement or the minimum annual local housing need figure using the standard method for calculating housing need set out in national guidance. Delivery is assessed against the previous three year period and therefore there are transitional arrangements in place whereby the minimum housing need figure is replaced by household projections.
- 3.6 Information from the Government's Housing Delivery Test Measurement² found that Breckland had achieved a 119% delivery and therefore none of the measures to be applied to local authorities who under deliver apply in the District and a 5% buffer should be applied to the 5 year supply.

4 Supply

- 4.1 The supply of housing anticipated to be delivered over the next 5 years is set out in the trajectory in the Local Plan. This is included in Table 2 below.

5 Conclusion

- 5.1 Table 2 demonstrates that the Council can demonstrate a 5 year supply of housing land with a buffer of 5, 10 or 20%. Under the requirements of the Housing Delivery Test it is considered that the application of a 5% buffer is most appropriate. **Therefore the Council's 5 year housing land supply position is 6.00 years**

¹ The Housing Delivery Test is an annual measurement of housing delivery within each District carried out by the Government. It assesses housing delivered against housing required with various consequences dependent on the level of under-performance.

² <https://www.gov.uk/government/publications/housing-delivery-test-2018-measuremen>

Table 2: 5 Year Housing Land Supply (2018 – 2023)	
HOUSING REQUIREMENT (2018 – 2023)	
5 years at 612 per annum	3060
Shortfall (2011 – 2018)	779
Shortfall spread next five years (2018 - 2023)	156
Housing Target 2018 – 2023 including shortfall (5% buffer applied)	$(3,060 + 779) * 1.05 = 4,031$
Housing Target 2018 – 2023 including shortfall (10% buffer applied)	$(3,060 + 779) * 1.10 = 4,223$
Housing Target 2018 – 2023 including shortfall (20% buffer applied)	$(3,060 + 779) * 1.20 = 4,607$
Annual Requirement (5% buffer)	$4,031 / 5 = 806$
Annual Requirement (10% buffer)	$4,223 / 5 = 845$
Annual Requirement (20% buffer)	$4,607 / 5 = 921$
HOUSING SUPPLY (2018 – 2023)	
Large sites with planning permission	2977
Small sites with planning permission	748
Sites with resolution to grant planning permission	423
Not superceded Allocations	112
Local Plan Allocations	370
Policy HOU03 and HOU04	60
Windfall Development	150
Total	4,840
5 YEAR HOUSING LAND SUPPLY POSITION STATEMENT (5% buffer)	$4,840 / 806 = 6.00$ years
5 YEAR HOUSING LAND SUPPLY POSITION STATEMENT (10% buffer)	$4,840 / 845 = 5.73$ years
5 YEAR HOUSING LAND SUPPLY POSITION STATEMENT (20% buffer)	$4,840 / 921 = 5.26$ years