

Mendip District - Five Year Housing Land Supply December 2019

Introduction

1. This note summarises the five year housing land supply position for Mendip District as at December 2019. This report takes into account changes in the method for calculating five year housing supply introduced in the revised National Planning Policy Framework in July 2018. It provides a five year supply position based on 'Local Housing Need or 'LHN'. This is the figure is to be used where an adopted Local Plan Housing Requirement is more than five years old. The LHN figure now applies to Mendip (as of 15th December 2020). A calculation based on the previous adopted Local Plan figure is also shown for comparison.

Headline Position

- Based on a Local Housing Need target of 3171 dwellings, the Council's estimate of adjusted deliverable supply of 2,408 dwellings. This is a shortfall of 763 dwellings and equates to 3.8 Years Supply.
- The Council cannot therefore demonstrate a five years supply and provisions in NPPF Para 11 come into effect (See Para 27).

Establishing the Housing Requirement

2. NPPF Para 73 is clear that five year supply should be based on a housing requirement in adopted strategic policies where a Local Plan is less than five years old from adoption.
3. The relevant strategic policies for housing are set out in the ***Mendip District Local Plan Part I: Strategy and Policies 2006-2029*** which was adopted on 15th December 2014. This Plan remains in date until 14th December 2019. The adopted housing requirement is 9,635 dwellings over the plan period or **420 dwellings per annum** from 2011-2029.
4. From 15th December 2019, the five year supply is based on a Local Housing Need figure (or LHN). This is an annual estimate of the number of dwellings required in Mendip calculated using a national 'standard method' as described in national planning guidance. There are circumstances where 'alternative' figures to LHN can be considered, but these do not apply to Mendip at this time.
5. LHN is based on published national statistics on ten year household growth and an 'uplift' which reflects the local 'affordability' of housing. The Council have published a separate note on its website covering the calculation of LHN. This will be updated when new statistics or guidance is released.
6. **The Local Housing Need Requirement figure on 15th December 2019 is 604 dwellings per annum.**

Establishing the ‘Buffer’ Figure

7. NPPF Para 73 requires an additional 5% buffer to be added to the five year supply to ensure ‘*choice and competition in the market for land*’. Other buffers may be applied where Council is seeking to fix its five year supply (a 10% buffer) or where there is under-delivery based on the national Housing Delivery Test (a 20% buffer). The national test of housing delivery is a new measure introduced in the July 2018 NPPF.
8. The most recent Housing Delivery Test was published on 19th February 2019 which covers housing completions from 2015/16 to 2017/18. The published results of the test are shown in Table 1 together with estimated results for the current year to 2018/19. Table 1 demonstrates there is no evidence of housing ‘under-delivery’ in Mendip.
9. The correct buffer to apply to a target five year supply figure is 5%

	Target	Period	No of homes required	No of homes built	Result
DCLG Published 19.02.19	419	2015-2018	1257	1561	124%
Mendip Estimate for 01.04.19	419	2016-2019	1257	1562	124%

Calculation of a Five Year Supply Target Figure

10. Table 2 shows the target five year housing supply requirement based on LHN requirement of 604 units per annum and 420 units per annum (the Local Plan Figure). The LHN requirement equates to is 3,020 dwellings over five years. Adding a 5% buffer makes an overall target requirement of 3,171 dwellings. The target figure based on Local Housing Need is 3,171 dwellings.
11. There are alternative approaches to calculating the target figure which would include making a discount for over-provision during the plan period. However, the approach taken in Table 2 is considered the most straightforward and robust.
12. If the deliverable housing supply exceeds the relevant target, the Council is able to show it has a five year supply of housing land. **The current target figure is 3,171 dwellings.**

		Local Plan	Local Housing Need
(a)	Housing Requirement	420	604
(b)	Over 5 Years (a) x 5	2100	3020
(c)	Plus 5% buffer (b)* 5%	105	151
	5YS Target (b) +(c)	2205	3171

Housing Sites counted as part of the Five Year Housing Supply

13. Mendip's housing supply is based on estimated completions from housing sites which are judged to be *deliverable*. This term is defined in the Glossary of the NPPF.
14. Deliverable housing sites will include:
 - Sites under construction
 - Major sites (over 10 dwellings) which are not started but have a full or reserved matters permission
 - All minor sites (under 10 dwellings) with either a full or outline/permission

Deliverable housing sites can also include:

- Major sites with an outline planning permission,
- Major sites which are adopted or emerging allocations in the Mendip Local Plan
- Other sites (e.g. sites on the Mendip brownfield register) or schemes in which the Council has an enabling role (e.g. affordable housing)

However, sites in the above categories above can only be included where there is supporting evidence to demonstrate the site will start within five years.

15. The NPPF also advises that all sites should have a realistic prospect of coming forward. This means that where the Council is aware of a technical or other reason a site with permission will not progress – it should be discounted. For example some sites are excluded from the supply if the landowner or agent confirms the scheme will not be going ahead within five years or there is a history of non-implementation.

Mendip Housing Trajectory and Progress Reports on Major sites

16. The Council publish and update each year a Housing Trajectory for the District. This lists all schemes with permission, plan allocations and other development opportunities by towns and villages. The Trajectory provides annual estimates of the number of dwellings likely to be delivered from each site over the period 2019-2033. It therefore covers a much greater number of sites than just those which form part of the five year housing supply.
17. The trajectory is updated using housing and building control records and information returns from developers and agents. The Council also seeks to contact all applicants and agents with a live planning permission to confirm when development will start and other constraints to bringing forward development. The status of other sites may also be confirmed by officer site visits. Where the Council area aware, there are other planning or technical reasons why the scheme is may not come forward, these are already discounted from the delivery estimates.
18. The trajectory provides an initial estimate of dwelling delivery. This figure is then discounted based on a separate assessment of whether a particular site should be included in the five year supply. This is based on a set of **progress reports** for major housing sites in the District. Each report shows the current status of the site, its progress via planning and the assumptions on progress to implementation / delivery rates. These reports also provide links to supporting evidence from which the Council judge the site to be deliverable.

19. The draft Local Plan Part II is currently at examination and hearings took place in July and August 2019. The Housing Trajectory and progress reports for 2019 specifically take into account evidence submitted by both the council, agents and promoters on timing and deliverability of housing sites in the District. Cross-references to examination evidence are included in the progress reports.
20. Housing Progress reports (which only cover major sites/allocations over 10 units are published for the following areas:
- Frome, Glastonbury, Street, Shepton Mallet & Wells
 - Mendip Villages
 - Sites included in Local Plan Part II Main Modifications (currently not in five year supply)

It is expected that progress reports will be kept updated and will be provided to land promoters and developers in advance as a cross-check of evidence of delivery in future. Where promoters and developers are not able to confirm the deliverability of their scheme, this will be noted.

Deliverable Dwellings

21. Table 4 summarises expected housing delivery in Mendip over the next five years (2019/20 - 2023/24) extracted from the current published housing trajectory. This provides an initial total deliverable supply (without adjustments) of **2,621 dwellings**.

Table 4 - Estimated housing delivery 2019-20 – 2023-24

		1	2	3	4	5
Settlements		19/20	20/21	21/22	22/23	23/24
Frome		109	81	138	160	160
Glastonbury		59	66	72	36	0
Street		45	12	24	52	74
Shepton Mallet		7	2	42	72	79
Wells		119	118	164	121	119
Primary Villages *		51	50	51	50	51
Secondary Villages *		30	30	30	29	28
Villages & Countryside*		49	49	49	49	49
Sites on boundary with B&NES		0	0	0	0	45
Total - All Housing		469	408	570	569	605
						2621

Discounting and adjustments to Deliverable Supply

22. In some cases, delivery estimates for major sites may reflect informal' evidence of site delivery or are awaiting confirmation from promoters or developers. Where these sites do not have the benefit of a full planning permission, their contribution to five year supply is discounted from the total. These sites are listed in Table 5.

23. In previous five year supply monitoring, the council have applied a non-implementation discount even though it is not strictly required in the NPPF. The council will continue to make an adjustment based on 5% on unimplemented permissions (whether major or minor schemes). This a rate which has been accepted as robust in previous five year supply appeals.
24. Windfall sites are not included in the five year supply calculation. However, recognition of the lag between the end of the monitoring year and publication of the supply statement, an upward adjustment is made for new minor permissions granted since the trajectory was finalised Table 6,

		Mendip
Saxonvale - Acorn and Mendip	to be updated as application progresses	20
Land at Cherry Grove - Aster	awaiting RSL evidence	33
Land nr Street Cemetery	mendip assets to advise	32
John Burns Cottages	awaiting RSL supporting evidence	20
Land off Great Dunns Close	subject to LP2 Main Mods consultation	28
Land east of Toy Farm	outline - possible covenant issue	14
Land west of A367, Fosseyway	subject to LP2 Main Mods consultation	25
Land at White Post, Fosseyway	subject to LP2 Main Mods consultation	20
Total		192

	April	May	June	July	August	Total
Minor	8	17	5	5	6	41

Total delivery from housing Trajectory 2019-2023						2621
plus - minor sites granted (from 1.4.19 to 31.08.19)						41
less sites awaiting supporting evidence to confirm deliverability						-192
less non implementation allowance (5% of permissions yet to start)						-62
Total deliverable Housing Supply						2408

25. Table 7 lists the discounts and adjustments to deliverable supply totalling **2,408 dwellings**.

Five Year Supply Calculation

26. The five year supply calculation is set out in Table 8. For comparison, table 9 shows the five year supply based on the adopted Local Plan Figure of 420 homes per annum. (ie the supply up to 14th December 2019).

Table 8 - Five Year Supply Calculation v Local Housing Need (2019)*					
Five Year Supply Requirement					3171
Total Deliverable dwellings					2408
Five Year Requirement (annual rate)					634
No of Years supply					3.80
Surplus/shortfall over five year supply target					-763
Table 9 - Five Year Supply Calculation v Local Plan Target (for comparison)					
Five Year Supply Requirement					2205
Total Deliverable dwellings					2408
Five Year Requirement (annual rate)					441
No of Years supply					5.46
Surplus/shortfall over five year supply target					203

Position

27. Table 8 shows that the Council is not currently able to demonstrate a five year supply. This is the result of calculation being based against the Local Housing Need figure.
28. The five year supply figure is 3.8 years, a shortfall of 763 dwellings.
29. As a consequence of not being able to demonstrate a five year supply, the 'presumption in favour of sustainable development' as set out in Para 11 of the NPPF will apply. This means that policies in the Local Plan which are related to the delivery of housing can be considered as 'out of date' where they are relevant to the determination of a housing application.