# Housing Land Supply Position Statement

National Planning Policy

## The National Planning Policy Framework (NPPF) was first published on 27 March 2012 and was most recently revised in July 2021.

## The NPPF requires that the level of housing needed in an area to be calculated using a local housing need assessment. This should be conducted using the standard method set out in national planning guidance, unless exceptional circumstances justify an alternative approach.

## In addition to the local housing need figure, any housing needs that cannot be met within neighbouring areas must also be taken into account in establishing the amount of housing to be planned for in that area (NPPF, Para. 61)

## The size, type and tenure of housing needed for different groups in the community must also be assessed and reflected in planning policies. This includes but is not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to build their own homes (NPPF, Para. 62)

## When identifying a local housing requirement and supply, the NPPF establishes the following:

## (Local authorities) should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.

## (Local authorities) should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability, and likely economic viability. Planning policies should identify a supply of:

## a) specific, deliverable sites for years one to five of the plan period; and

## b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

## The NPPF also states that at least 10% of a local planning authority’s housing requirement should be met from smaller sites, i.e., smaller than one hectare, unless there are strong, evidenced reasons why this cannot be achieved.

## Whether a site is considered to be “deliverable” or “developable” should be informed by a Housing Land Availability Assessment. The Planning Practice Guidance (PPG) provides guidance on undertaking such assessments and replaces all previous guidance.

## **Housing Delivery Test**

## Changes made to the NPPF and PPG in July 2018 established the principle of the Housing Delivery Test (HDT).

## The HDT measures how well a local planning authority has delivered the required number of homes in its area over the previous three-year period. Further information on how the HDT results are calculated is set out in the Housing Delivery Test Measurement Rule Book[[1]](#footnote-1),published by MHCLG in July 2018, but can be summarised as the below:

## The HDT requires that where housing delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, the authority must prepare an Action Plan in line with national planning guidance. This Action Plan must assess the causes of under-delivery and identify actions to increase the number of homes built in future years.

## The revised Planning Practice Guidance (PPG) further states that:

## A 20% buffer will apply to a local planning authority’s five-year land supply if housing delivery falls below 85%: and

## The presumption in favour of sustainable development will apply if:

## Housing delivery falls below 25% of the housing requirement (up to 2018).

## Housing delivery falls below 45% of the housing requirement (up to 2019); or

## Housing delivery falls below 75% of the housing requirement (up to and beyond 2020).

## The latest Housing Delivery Test results published in January 2022 suggested that Rochford’s housing delivery over the last three years was 103% of its housing requirements. As a result, no penalties apply to the Council’s five-year land supply position and there is no requirement to prepare an Action Plan.

Local Planning Policy

## The Core Strategy, adopted on 13 December 2011, provides the overarching vision and strategy for the District up to 2025. It also sets out how the District will deliver its housing target of 250 houses per year up to 2025.

## Due to a number of factors, many of which were outside the Council’s control, upon adoption of the Core Strategy in 2011, the Council was committed to an early review in order to put in place a plan that covers at least 15 years.

## In order to ensure compliance with the NPPF, which came into force after the adoption of the Core Strategy, the housing target set out in the Core Strategy will also be updated in the early review of the plan in order to fulfil any readjustment of the future target.

## A new Local Plan is being produced in accordance with the NPPF and PPG which will be informed by proportionate and up-to-date evidence, including Strategic Housing Market Assessments (SHMA) and Strategic Housing and Employment Land Availability Assessments (SHELAA).

South Essex Strategic Housing Market Assessment (SHMA)

## Following the publication of the NPPF, the five South Essex authorities (which, in addition to Rochford District, include Basildon, Castle Point, Southend and Thurrock Borough Councils) appointed consultants, Turleys, to undertake an assessment housing need across the South Essex housing market area.

## The purpose of the SHMA is to determine the ‘Objectively Assessed Need’ (OAN) for housing across the housing market area. The OAN is an assessment of how much housing is needed in an area to meet demand and does not take into account the amount of homes that can actually be built. To calculate the OAN, the consultants undertook a detailed assessment of demographic and economic projections based on the most up-to-date data to 2037.

## The South Essex SHMA 2016, and subsequent SHMA Addendum 2017, concluded that the objectively assessed housing need for Rochford equated to between 331 and 361 homes every year up to 2037.

## A new South Essex SHMA is currently being prepared and is expected to be published later in 2022.

## **Local Housing Need**

## Changes made to the NPPF and PPG in July 2018 established a new standard methodology for calculating local housing need. The NPPF states that strategic plans should be based upon a local housing need assessment, conducted using the standard method in national planning guidance unless exceptional circumstances justify a different approach.

## Using the standard methodology – which supersedes the figures calculated in the South Essex SHMA – Rochford District’s local housing need equates to 360 houses a year up to 2032. It should also be noted that unmet housing need from neighbouring areas may also need to be taken into account when determining Rochford’s housing needs.

## It is recognised however that the standard methodology figure does not measure the need for specific types of housing, such as affordable or specialist accommodation. There therefore remains some value in noting the findings of the South Essex SHMA and Addendum.

Housing and Economic Land Availability Assessment (HELAA), previously SHLAA

## A Strategic Housing Land Availability Assessment (SHLAA) was first prepared in 2009; this was comprehensively reviewed and updated in 2012.

## The NPPF continues to require local planning authorities to undertake such assessments so that they know how much land is available, suitable and viable for housing.

## The Council undertook a “Call for Sites” between 22 June 2015 and 31 March 2016 to identify additional brownfield sites, or other land, that may have become available since adoption of the Core Strategy in order to inform a full review of the SHLAA in its entirety. The likely deliverability and developability of sites identified in the 2012 SHLAA have however been reconsidered within each successive monitoring report to date and included within the housing trajectory as appropriate. Following the closure of the Call for Sites, sites submitted for consideration have been assessed in line with the PPG to determine their deliverability or development.

## A Housing and Employment Land Availability Assessment (HELAA) was published in November 2017. The Council re-opened the Call for Sites following the publication of its 2017 SHELAA, which closed again on 31 May 2018.

## A subsequent Housing and Employment Land Availability Assessment (HELAA) update has been prepared, assessing the deliverability of sites not identified at the time of the previous assessment in 2017, and alongside the 2017 HELAA and subsequent monitoring, present a robust understanding of the availability of all land for housing and economic development on an April 2019 baseline.

## As set out in Table 4.1 below, emerging findings from the 2020 HELAA have identified a total of 113 sites that were considered to be deliverable or developable for housing development with a potential yield of 3,555 houses. The 2020 HELAA identified a further 250 sites that were potentially deliverable or developable subject to policy with a potential yield of 56,749 houses. These sites were generally sites put forward through the Call for Sites that were subject to surmountable policy constraints, including Green Belt or flood risk.

**Table 4.1 – Emerging Summary Findings of 2020 HELAA**

|  |  |  |
| --- | --- | --- |
| **Category** | **Number of Sites** | **Number of Houses** |
| **Deliverable** | 105 | 3052 |
| **Deliverable (subject to policy)** | 235 | 51961 |
| **Developable** | 8 | 503 |
| **Developable (subject to policy)** | 15 | 4788 |
| **Not deliverable or developable** | 18 | 1477 |

## **Brownfield Land Register**

## In accordance with regulations[[2]](#footnote-2), the Council published an annual update to its Brownfield Land Register in early 2020. This Register sets out a list of sites in Rochford District that:

## Meet the definition of Previously Developed Land, as set out in Annex 2 to the NPPF.

## Have a site area of at least 0.25 hectares OR be capable of supporting at least 5 houses.

## Are considered suitable for residential development (development on the site would comply with local and national planning policies).

## Are considered available for residential development (on best information, the landowner/developer is willing to develop the site); and

## Are considered achievable for residential development (on best information, it would be viable to develop the site within 15 years.

## The Council’s Brownfield Land Register 2020[[3]](#footnote-3) identifies a total of 20 sites which together are considered capable of providing a minimum of 720 houses over the next 15 years, and comprise a mix of brownfield sites allocated for residential development in the Council’s current local development plan, brownfield sites which currently have planning permission for residential development, and brownfield sites which are considered to be suitable for future planning permissions for residential development.

## Where appropriate, sites from the Council’s Brownfield Land Register have been incorporated into the housing land supply figures set out within this chapter.

## The Council will continue to undertake reviews of its Register at least annually and publish these reviews on its website.

**Five Year Housing Land Supply Position**

## The starting point for calculating the District’s five-year housing land supply is to establish the five year housing requirement. Paragraph 005 of the PPG[[4]](#footnote-4) makes it clear that where a housing requirement in the local development plan is more than five years old, it should no longer be used for the purposes of five year housing land supply calculations and that, in such circumstances, the authority’s local housing need figure, calculated using the standard methodology in the PPG[[5]](#footnote-5), should be used instead.

## As the Council’s Core Strategy was adopted in 2011, it is now more than five years old. As a result, the Council is required to use a housing requirement calculated using the standard methodology in the PPG for the purposes of any five-year housing land supply calculations. The District’s local housing need figure for 2021-2026, calculated using the standard methodology, is 1,810 homes or annualised as 362 homes per year.

## To ensure that there is a realistic prospect of achieving the planned level of housing supply, the PPG further requires local planning authorities to add on an appropriate buffer depending on the circumstances of housing delivery over the previous 3 years. The appropriate buffer in the case of the Council is 5%, as its Housing Delivery Test performance was not such that a 20% buffer would apply.

## The methodology used for the purposes of five-year housing land supply calculations is set out below:

## Appendix B sets out the Council’s detailed housing trajectory (including the five-year supply) between 2021/22 and 2031/32. From this trajectory, it is possible to identify that a minimum of 3,174 houses are expected to be delivered across the District by 2032, of which 2,176 are expected to be delivered within the next five years.

## At this stage, the housing trajectory found in Appendix B only includes those sites with extant planning permissions, allocations for residential development or any sites identified through other means, such as the 2017 SHELAA and emerging HELAA update, which are expected to be deliverable or developable. It is recognised that the NPPF clarifies that sites should only be considered deliverable for the purposes of these calculations where:

## a) (for) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, (they) 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) or, 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.

## Whilst a small number of sites without planning permission have been identified as being potentially deliverable in the Council’s evidence base, including its 2017 SHELAA or 2020 HELAA, these sites have not been included in the first five years of the housing trajectory given there is not necessarily clear evidence that homes will be delivered within five years and the Council is able to demonstrate a five year supply of housing without them.

## It is recognised that the Council, through its new Local Plan, will need to consider the suitability, availability, and achievability of additional land to meet future development needs, including undertaking an assessment of its Green Belt. At the current time, such sites have been excluded from this trajectory, given their deliverability or developability is yet to be established.

## The housing trajectory at Appendix B includes a windfall allowance of 45 homes per year, beginning in year 4 of the trajectory. The windfall allowance only makes a modest contribution to the housing supply figures within the first five years (of 90 homes), nevertheless, a reasoned justification for the allowance is set out in the Council’s 2020 Housing and Economic Land Availability Assessment.

## As acknowledged above, the PPG makes it clear that where an authority’s housing requirement is more than five years old, five-year housing land supply calculations should use an authority’s local housing need figure, calculated using the standard methodology in the PPG, as its starting point. **The figures provided below should be taken as the Council’s definitive five-year housing land supply position for the purposes of this statement.**

Table 4.3 – Key Housing Supply Figures (based on requirement of 362 houses per year)

|  |  |
| --- | --- |
| Local housing need using standardised methodology for assessing housing need | 360 houses per year or 1,800 houses over five years |
| Housing requirement plus 5% buffer | 1,890 houses over five years |
| Deliverable housing supply | 2,176 houses over five years |

## At 362 houses per year, which already factors in previous shortfall, the District’s housing need equates to 1,800 over the next five years. With a 5% buffer, this increases to 1,890 homes.

## Within the trajectory set out at Appendix B, the Council has been able to identify a supply of 2,176 houses over the next five years. This supply is sufficient to deliver the District’s housing needs over that period, even with a 5% buffer.

## Table 4.4 below demonstrates Rochford District Council’s housing land supply position in years.

## **Table 4.4 – Five-year housing land supply scenario**

|  |  |
| --- | --- |
|  | **Housing Land Supply (in Years)** |
| **Annual Need: 360** |
| **Annual Supply:** | 5.76 |

1. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/728523/HDT\_Measurement\_Rule\_Book.pdf [↑](#footnote-ref-1)
2. https://www.gov.uk/guidance/brownfield-land-registers [↑](#footnote-ref-2)
3. https://www.rochford.gov.uk/planning-and-building/planning-policy/brownfield-register [↑](#footnote-ref-3)
4. <https://www.gov.uk/guidance/housing-supply-and-delivery> [↑](#footnote-ref-4)
5. <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> [↑](#footnote-ref-5)