

APPENDIX JG3
APP/B1740/W/20/3265937

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PINS Ref: APP/B1740/W/20/3265937

Stanford Hill, Lymington.

New Forest District Council 5year housing land supply statement.

New Forest District Council

Housing Land Supply Position Statement

1. Introduction

- 1.1. This Statement is prepared in order to set out the Council's position regarding five-year housing land supply and the reasons and context behind that position for this Appeal for 44 apartments for older persons at the site of The Rise and Three Neighbouring Properties, Stanford Hill, Lymington.

2. Local Context

- 2.1. The adopted (July 2020) Local Plan 2016-2036 Part 1: Planning Strategy makes provision for at least 10,420 dwellings over the Plan period 2016-2036. This is more than a 2.5-fold increase on the previous Core Strategy housing target of 3,920 dwellings over the period 2006-2026.
- 2.2. To fulfil the significant uplift in the housing target and achieve the necessary boost in housing supply and delivery, the Local Plan 2016-2036 Part 1: Planning Strategy allocates 18 significant new sites for residential development for a combined total of at least 5,995 additional dwellings. These are all brand new allocations, none of which had previously been allocated before or had planning permission with the exception of a small element of Strategic Site 1: Land to the north of Totton which had an outline planning permission for up to 80 dwellings. Delivering 18 new major housing development sites effectively from scratch is a very significant challenge and will logically need time.
- 2.3. The Council has done everything it should have in terms of increasing future housing land supply in the Plan Area including reviewing and recently adopting its Local Plan and maintaining a Brownfield Land Register.

3. National Planning Policy Context

- 3.1. The National Planning Policy Framework (NPPF) 2019 (paragraph 73) requires authorities to:

“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 set out in adopted strategic policies.”

- 3.2. The definition of ‘deliverable’ is set out in Annex 2 of the NPPF 2019. Annex 2 explains that:

“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.”

3.3. The Planning Practice Guidance (PPG) (Paragraph: 007 Reference ID: 68-007-20190722) provides further guidance on what constitutes a deliverable site and the evidence required to demonstrate that a site is deliverable. The PPG states that:

“In order to demonstrate 5 years’ worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions. Annex 2 of the National Planning Policy Framework defines a deliverable site. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:

- *have outline planning permission for major development;*
- *are allocated in a development plan;*
- *have a grant of permission in principle; or*
- *are identified on a brownfield register.*

Such evidence, to demonstrate deliverability, may include:

- *current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
- *firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;*
- *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.”*

4. New Forest District Council’s Position regarding the current Five-Year Housing Land Supply

4.1. This section sets out the housing land supply position the Council is taking for this Appeal and the reasons and context behind that position.

4.2. At the Examination Hearings into the Local Plan 2016-2036 Part 1: Planning Strategy (which was found sound in March 2020 and then adopted by the Council in July 2020), two delivery trajectories for the strategic site allocations were put in front of the Inspectors:

- A trajectory¹ devised by the Council using a series of reasonable assumptions² to project strategic site delivery timescales
- A trajectory³ representing the data provided by the respective strategic site promoters in July 2019 setting out their delivery intentions

¹ [EXAM28B](#)

² Set out in [EXAM28A](#)

³ [EXAM28C](#)

- 4.3. In their Report on the Examination of the Local Plan (March 2020)⁴, the Inspectors state at paragraph 260 that:

“The Council has made reasonable estimates of the minimum capacity for each site and realistic assumptions regarding the timescales for delivery and the rate of annual completions. There is clear and strong interest in bringing the sites forward for development and in many cases, active plans to do so in the near future.”

- 4.4. The Inspectors, however, also recognised that (paragraph 261):

“In many cases, the site promoters consider that the site could reasonably accommodate more than the minimum figure set out in the Local Plan and that completions could start earlier than the Council anticipates (set out in the alternative version of the trajectory EXAM 28C).”

- 4.5. In paragraph 266, the Inspectors consequently concluded that:

“It may be that at least in some cases this optimism in terms of the capacity of sites, timescales and annual rates of delivery is well founded and we consider it reasonable to conclude therefore that the realistic position regarding a five year supply is likely to fall somewhere between the two assessments.”

- 4.6. The above paragraphs from the Inspectors’ Report on the Examination illustrate that the Inspectors considered that a realistic and reasonable position on site delivery was likely to fall in-between the two trajectory assessments presented to them.

- 4.7. The trajectory in the published Statement of Housing Land Supply (position as of 1 April 2020)⁵ reflected these conclusions reached by the Local Plan Inspectors in their Report and was also informed by the site delivery proformas the site promoters completed and returned in July 2019 setting out the site-specific technical work that had been completed to date, and their intentions regarding delivery timescales and build-out rates. In the majority of cases, the Council did take a more conservative view on delivery compared to the site promoter.

- 4.8. In the passage of time since the Local Plan Examination and the publication of the Inspectors’ Report, the Council acknowledges that the 18 new strategic site allocations have not progressed sufficiently far through the planning application process to sustain the timescales for delivery projected in the Council’s published Statement of Housing Land Supply.

- 4.9. The Council is currently in the process of reviewing the housing trajectory and producing an updated Five-Year Housing Land Supply Statement for the period 1 April 2021 to 31 March 2026. This will be informed by latest end of financial year monitoring information and engagement with site developers. Developer engagement will establish their latest delivery intentions through an updated monitoring survey on site-technical assessment work progressed and intentions regarding timelines for application submission, and timescales for delivery and expected build-out rates.

⁴ <https://newforest.gov.uk/media/355/inspectors-report-local-plan-examination/pdf/inspectors-report-local-plan-examination.pdf?m=637232374008100000>

⁵ https://newforest.gov.uk/media/1107/Statement-of-Housing-Land-Supply-and-Housing-Trajectory-2016-2036-Position-as-of-1-April-2020-/pdf/Statement_of_Housing_Land_Supply_and_Housing_Trajectory_2016-2036_Position_as_of_1_April_2020.pdf?m=637363615385030000

- 4.10. The updated Housing Land Supply Statement will be published in summer 2021 which will establish and set out the exact up-to-date five-year housing land supply position. Until the work described in paragraph 4.9 is completed it is not possible to take a definitive position on whether or not the Council has a five-year housing land supply at this present point in time and to attempt to do so through this Appeal Inquiry would not be practical or worthwhile.
- 4.11. Most of the strategic site allocations are either now in pre-application discussions or at planning application stage and the Council is committed to working collaboratively with the site developers in order to bring these sites forward successfully.