

**Proof of Evidence of Elizabeth
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Prepared For
**South Somerset District
Council**

APP/R3325/W/20/3265558



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1 THE AUTHOR – QUALIFICATIONS AND EXPERIENCE

- 1.1 My name is Elizabeth Alexander. I hold a Bachelor of Arts Honours Degree in Geography and a Master of Philosophy in Town Planning. I am a chartered town planner and was elected to Membership of the Royal Town Planning Institute in 1994. I have practiced planning since September 1990.
- 1.2 I joined Bell Cornwell LLP in 2016 and lead the practice's work on strategic planning and planning policy. This includes advising clients on the implications of housing numbers and housing land supply matters. I have a wide private client base and deal with a variety of planning applications and appeals. I also regularly represent clients at local plan examinations.
- 1.3 Prior to joining Bell Cornwell LLP, I worked for West Berkshire Council as the Planning Policy Team Leader leading the Council's work on firstly the Core Strategy and then the Housing Site Allocations Development Plan Document, both of which were found sound. I led on all aspects of evidence base preparation, including the preparation of the 5 year housing land supply position.
- 1.4 I have also held local government roles at other local authorities including Basingstoke and Deane Borough Council and Buckinghamshire County Council.
- 1.5 The evidence which I have prepared and provide for this appeal is true and has been prepared and is given in accordance with the guidance of my professional institution, the Royal Town Planning Institute. I confirm that the opinions expressed are my true and professional opinions, irrespective of by whom I am instructed.
- 1.6 In January 2021, I was contacted by the Strategic Planning Policy officer at South Somerset District Council to ask if Bell Cornwell would be interested in tendering to supply consultancy services to act as a specialist housing land supply witness for a future appeal at the Council. This was specifically in regard to the matters of housing numbers and housing land supply.
- 1.7 Since being awarded the contract, I have spent a considerable amount of time discussing housing issues with officers within the Council. I have visited the major sites set out within the Council's 5 year housing land supply and the appeal sites. I have independently assessed the position with regard to housing numbers and housing delivery.



2 BACKGROUND TO THE APPEAL PROPOSALS

2.1 This is an appeal into a refused planning application as follows.

2.2 The application description was :

Outline application for the demolition of existing buildings and residential development of 60 units including the creation of a new vehicular access and pedestrian accesses, open space, landscape planting and surface water attenuation (all matters reserved except access).

2.3 The application was refused on 14 August 2020.

2.4 The planning evidence for these appeals is set out in the proofs of evidence that has been prepared by David Kenyon. This includes information about the relevant site history, further details about the appeal proposal and the technical planning reasons for refusal. This information is not repeated within this proof of evidence which focuses solely on the matters of housing numbers and housing land supply.

2.5 The appeal was a delegated refusal. The delegated officer report refers to the Council's inability to demonstrate a five year supply of deliverable housing sites, meaning that the policies which were the most important for determining the application were considered to be out of date and the presumption in favour of sustainable development applied.

2.6 The officer report states that at the time of writing (August 2020) there was a supply equivalent to about 4.5 years based upon the assessment of future housing land supply for the period 2019/20 to 2023/24 (this equated to 4,711 dwellings). This lack of supply was considered in the planning balance. This position has now changed and the Council can currently demonstrate a 6.03 year housing land supply. This is based on the position at 31 March 2020, published in November 2020 and then updated via addendums in January 2021 and March 2021 to reflect the position firstly on the updated standard method and secondly to reflect the new affordability ratios for calculating the local housing need.

2.7 The Local Plan is currently being reviewed to cover the time period 2020-2040. This has been through the Regulation 18 Consultation and the Publication Plan (Regulation 19) is scheduled for consultation in mid-2022.



- 2.8 In the preparation of this proof of evidence, I have read the Statement of Case prepared by the appellants and respond to these points within the next sections of this proof as far as they relate to housing numbers and housing land supply issues.
- 2.9 At the time of preparing this proof, I do not know what sites or delivery assumptions the appellant intends to challenge. I will seek to reach as much agreement as possible with the appellant before the inquiry. However, it may be necessary to prepare a rebuttal proof in order to save inquiry time.



3 THE HOUSING REQUIREMENT

- 3.1 The housing requirement for the South Somerset area is set out within the Council's Housing Land Supply calculation as at 1 April 2020 (published July 2019) (CD11.07) as amended firstly by an addendum which was prepared in January 2021 (CD11.07A) following the publication of the Government's revised standard methodology for calculating the local housing need for local authorities within revised Planning Practice Guidance on Housing and Economic Needs Assessment. This was amended secondly by an addendum prepared in March 2021 following the update of the affordability ratio (CD11.07B)
- 3.2 The calculation uses the 2014-based household projections for the period 2021 to 2031 and the 2020 affordability ratio (published March 2021) to derive a local housing need figure of 690 dwellings per annum. A 5% buffer is added in response to the NPPF para 73 (a). The justification for the 5% buffer is explained below.

POLICY JUSTIFICATION FOR USING THE STANDARD METHOD

- 3.3 The National Planning Policy Framework (2019) confirms in paragraph 60 that the standard method set out in national planning guidance is to be used as the basis for calculating the housing requirement unless "exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals".
- 3.4 Paragraph 73 of the NPPF sets out 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 set out in adopted strategic policies or against their local housing need where the strategic policies are more than five years old". The requirement has not been subject to an NPPF footnote 37 review.
- 3.5 The strategic policies for the District are set out in CD11.03 the South Somerset Local Plan 2006-2028. This was adopted in March 2015. It is therefore more than five years old. The local housing need is therefore used for the calculation of the five year housing land supply.
- 3.6 Paragraph: 003 Reference ID: 2a-003-20190220 of the Planning Practice Guidance reiterates that the standard method should be used and includes the wording "There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances".



- 3.7 Further detailed information about the calculation of the local housing need (the standard method) is then set out. The PPG (Paragraph:005 Reference ID: 2a-005-20190220) clarifies that the 2014-based household projections are used within the standard method to provide “stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes”.
- 3.8 South Somerset District Council uses the standard method in accordance with national policy and guidance.

THE BASIC ANNUAL HOUSING REQUIREMENT

- 3.9 The Planning Practice Guidance then goes on to explain the calculation of the local housing need figure.
- 3.10 *Step 1 - Setting the baseline - Set the baseline using national household growth projections (2014-based household projections in England, table 406 unitary authorities and districts in England) for the area of the local authority. Using these projections, calculate the projected average annual household growth over a 10 year period (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period). Note that the figures displayed are rounded and individual cells need to be viewed in order to see the full number.*
- 3.11 *Step 2 - An adjustment to take account of affordability - Then adjust the average annual projected household growth figure (as calculated in step 1) based on the affordability of the area.*
- 3.12 As set out above, the 2014 household projections are used to provide the baseline figure over the ten year period from 2020 to 2030. An affordability adjustment is then applied as household growth on its own is insufficient as an indicator of future housing need. The PPG (Paragraph: 006 Reference ID: 2a-006-20190220) confirms that “the affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes”. The PPG goes on to confirm (Paragraph: 011 Reference ID: 2a-011-20190220) that **“The affordability adjustment is applied to take account of past under-**



delivery. The standard method identifies the minimum uplift that will be required and therefore **it is not a requirement to specifically address under delivery separately**". (emphasis added).

- 3.13 In some circumstances it can be necessary to 'cap' the level of any increase to the housing numbers, to limit the increases that a local authority can face. The local housing need figure is capped at 40% above either the projected household growth over the 10 year period (step 1 below) or the average annual housing requirement figure set out in the most recently adopted strategic policies.
- 3.14 The average annual housing requirement figure in South Somerset's Local Plan is 725 dwellings per annum. Applying 40% to this would give a figure of 1,015 dwellings per annum.
- 3.15 The capped figure is greater than the local housing need figure and therefore does not limit the increase to the local authority's minimum annual housing need figure.
- 3.16 No cap is applicable in South Somerset
- 3.17 The Local Plan sets out a housing requirement of 15,950 dwellings to be delivered over the 22 year period. This equates to an annualised average of 725 dwellings per annum. However, applying the national standard formula for the District, the Basic Need Housing figure per annum is **690**, or 13,800 over a Plan period of 20 years .
- 3.18 The correct calculation is clearly set out in Government guidance as I have demonstrated above. Any adjustments to this figure are made through the plan-led system. The Council is progressing a Local Plan Review and has a published timetable for the work set out on the Council's website which confirms that public consultation on the publication plan will take place in mid-2022.

HOUSING DELIVERY TEST

- 3.19 The Government introduced the Housing Delivery Test (HDT) in 2018, with the first results of the HDT published by the Secretary of State in November 2018 and two subsequent results published, the most recent of which was January 2021. The HDT measures the net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data.



- 3.20 The HDT provides a measure based on the preceding 3 financial years. Therefore, the HDT results that were published in November 2018 used data from 2015-16, 2016-17 and 2017-18. The results that were published in January 2021 used data from 2017-18, 2018-19 and 2019-20.
- 3.21 The Local Housing Need figure is used for the calculation.
- 3.22 The most recent data for South Somerset shows that between 2017 and 2020, the Council delivered a total of 1,872 homes, which was 95% of the total number of homes required. This means, that in accordance with para 73 (a) of the NPPF, a 5% buffer needs to be added to the five year supply to ensure 'choice and competition in the market for land'.
- 3.23 The buffer should be addressed in the first five years. Buffers are not in themselves cumulative and the appropriate one should be applied depending on the circumstances.
- 3.24 The Council has therefore added a 5% buffer to its land supply position in accordance with Government policy and guidance.



4 HOUSING LAND SUPPLY

- 4.1 The Council is currently able to demonstrate a five year housing land supply with a figure of 6.03 years relating to the monitoring period 1 April 2020 to 31 March 2025.
- 4.2 As set out in para 3.1 above, the most recent position was published in November 2020 (CD11.07), with an addendum to reflect the update to the calculation of the standard method published in January 2021 (CD11.07A). A further addendum (CD11.07B) was published at the end of March 2021 to take into account the new affordability ratios that were published by the Government on 25th March 2021.
- 4.3 The published housing land supply information is based on the position at 31 March 2020, however para 1.1 of CD11.07 confirms that the information on extant planning applications and pending applications is accurate up to 31st May 2020.
- 4.4 I have independently assessed the position to see if I concur with the published outcomes.

HOUSING REQUIREMENT

- 4.5 As the housing requirement set out in the Strategic policies (the Council's Core Strategy) is over 5 years old, the Council is, correctly, using the standard method as the basis of calculating the housing requirement for the 5 year housing land supply. I have concluded in paragraph 3.18 above that the Local Housing Need (LHN) for the South Somerset authority area is 690 dwellings per annum. I have set out in paragraph 3.23 above that the outcomes of the HDT require a 5% buffer to be added to the 5 year housing land supply requirement.
- 4.6 I show this position in table A, below.

TABLE A: HOUSING REQUIREMENT OVER THE NEXT 5 YEARS

Components of the housing requirement	Calculation	Result
Housing requirement over the next 5 years	690 x 5	3,450
5% buffer requirement	3,450 + 5%	3,623 (rounded)
Annual requirement over next 5 years (2020-2025)	3,623/5	725 (rounded)



- 4.7 This gives an annual requirement of 725 dwellings between 2020 and 2025, calculated in accordance with Government guidance.

HOUSING SUPPLY

- 4.8 The housing land supply calculation is made up of different components of deliverable supply, which taken together give a figure for the projected completions over the next 5 years (2020/21 to 2024/25).
- 4.9 The detail of the Council's commitments is set out within the 'Planning Commitments for Housing' which was published in November 2020 and is based on the position at 31 March 2020 but including information on sites up to the end of May 2020.
- 4.10 This sets out that the total net completions in South Somerset District during the monitoring year from 1 April 2019 to 31 March 2020 was 651 dwellings. The detailed schedules in CD11.07 set out the up to date status on the various sites (as at 31 March 2020), setting out the planning position, what is currently under construction and what the forecast delivery is for the next 5 years. The position for the next two five year period (2025-2030 and 2030-2035) is also included.
- 4.11 The Council has taken a robust approach to assessing the deliverability of sites. Sites are not included where there are pending applications within the supply unless there are clear reasons and expectations that the site will be approved and come forward and be delivered within that timeframe.
- 4.12 All outline permissions under 10 dwellings have been included in the first five years. Outline permissions for major development, as defined in the NPPF are not generally included within the first five years' housing land supply, unless there are clear reasons and expectations (based on evidence) that the site will be approved and come forward and be delivered within that timeframe – see NPPF definition of 'deliverable'..
- 4.13 The Council is proactive in maintaining an up to date position on housing delivery in the District. Site visits are carried out annually to assess progress.
- 4.14 As well as carrying out site visits in order to confirm the current position on development sites, the Council also liaises directly with the developers of the larger sites in order to discuss the



future delivery of the sites. This information to assessing the likely delivery on sites is summarised in CD11.07 which sets out at para 4.4 that:

All outline permissions under 10 dwellings have been included in the first five years. Outline permissions for major development, as defined in the NPPF5 are not generally included within the first five years' housing land supply, unless there are clear reasons and expectations that the site will be approved and come forward and be delivered within that timeframe, as advised by relevant developers and their agents through the Large Sites Survey undertaken this year. This involved contacting developers and landowners or their agents of all major sites with planning permission. Where no feedback was forthcoming, the deliverability of major sites was based on any feedback from the previous year's (2019) survey; analysis of any completions during 2019/20 regarding build out rates; and discussions with development management officers.

- 4.15 I consider that this is a robust and detailed assessment. The outcomes of the monitoring process are set out in the Council's housing trajectory which informs the preparation of the five year housing land supply. This shows a healthy position with high completion rates forecast for this year (2020/21) and next year (2021/22).

APPROACH TO WINDFALL SITES

- 4.16 Additionally, the Council includes a modest windfall allowance of 20 units per annum (100 units in total.. Para 4.10 of CD11.07 explains this in full; however, in summary the continued contribution of windfall sites is due to the nature of the District which has large number of smaller settlements where there are continued opportunities for this type of development.
- 4.17 Including a windfall allowance in South Somerset is supported by the evidence on this source of supply. This includes the following table, which shows windfall completions over a ten year period.



Year	Windfall Sum
2010/2011	96
2011/2012	61
2012/2013	87
2013/2014	65
2014/2015	92
2015/2016	178
2016/2017	82
2017/2018	124
2018/2019	117
2019/2020	98

10 Year

Average 100

4.18 Having examined the previous delivery rates on windfall sites in the District, I consider that the Council's approach to windfalls is extremely cautious and that the windfall allowance is likely to be exceeded over the 5 year period. This adds further flexibility into the housing land supply.



NON-IMPLEMENTATION RATE

- 4.19 The Council has applied a 5% discount to the overall housing supply for the first time to take account of non-implementation and to ensure that the housing land supply calculation is robust. The 5% discount is higher than the previous year's figure of 2.3%.
- 4.20 The inclusion of a higher lapse rate than the evidence suggests is appropriate and is a planning judgement which adds a further element of robustness to the five year supply.

APPROACH TO CARE HOME DELIVERY

- 4.21 The expected delivery of care homes is included in the calculation of new housing delivery and future housing supply. The Housing Delivery Test (HDT) Rule Book (July 2018) and subsequent 2018 Measurement Technical Note (February 2019) make it clear that an adjustment should be applied to communal bedspaces to calculate the number of net dwellings that would be freed up from net additional communal accommodation built by applying a national ratio of 1.8.
- 4.22 The Council applies this national ratio of 1.8 to the number of rooms provided, which follows the methodology published in the Housing Delivery Test Measurement Rule Book.

ACCELERATED DELIVERY PROGRAMME

- 4.23 The Council now employs an Accelerated Housing Delivery Programme Manager (AHPM), who has been in post since 8 October 2020. His role, together with a team of specialist officers from across the Council, is to deliver the Accelerated Housing Delivery Programme through the implementation of key strands of work. This post was put in place as a response to a report which was commissioned by the Council from the 3 Dragons consultancy (CD11.16).
- 4.24 The 3 Dragons report, published in June 2020, was commissioned in response to a concern that the Council was not achieving its housing targets set out in the Local Plan and the broader implications of this. The report sets out a way ahead to achieve a faster delivery for all types of homes and to ensure a pipeline of delivery for the future. It makes a range of recommendations and suggests an action plan for the Council to consider. This is a priority



project as identified in the Council Plan and the outcomes of the 3 Dragons report were discussed at the District Executive Committee on 2 July 2020.

4.25 The Council has responded proactively and targeted considerable resource to addressing the matters raised.

4.26 The overall aims of the programme are as follows:

- Unlock major sites with planning permission
- Enable complex key sites to move forward
- Ongoing negotiation with developers and affordable housing providers
- Support the growth of new entrants and small and medium sized developers within the local market.
- Build a strong relationship with Homes England to explore public sector support.

4.27 Good progress has been made since the AHPM started in post and a summary is set out below:

Development Industry Dialogue

4.28 This element of the programme is now complete. All key developers have been directly contacted and are aware of the accelerated housing programme, together with registered affordable housing providers as well as land agents and promoters of strategic sites.

Pipeline Housing Projects and 5-Year Housing Land Supply

4.29 The Council's housing land supply position has taken into account the effects on site delivery of those that are affected by phosphates and the need to demonstrate nutrient neutrality. The Council has a working group to deal with the issue and seek a mitigation strategy. A dialogue has been established with all stakeholders and neighbouring authorities to seek an early resolution to the issue (the up to date position is explored further in paras 4.31-4.33 below).

Governance and Leadership

4.30 The accelerated housing programme team is now established and the manager is in-situ, regular monthly team meetings and focus sub-meetings are held which concentrate on key



site delivery, building stronger relationships with Homes England, preferred partners and reviewing best practice for the legal and planning process

Building member awareness of the current land supply, housing shortage and measures to increase the speed of development processes

- 4.31 The AHPM has held briefings with key Councillors to raise awareness.

Progress delivery of key sites in Yeovil, Chard and Crewkerne

- 4.32 Meetings have taken place with key developers with the aim to be to unlock any site specific issues which may be affecting delivery.

- 4.33 One example of this is the CEDA Chard Eastern Development Area. All of the landowners, promoters and agents in the CEDA area have been contacted by the AHPM to move the project forward. All of the land is affected by phosphate. A dialogue to seek a way of delivering the proposed highway improvements to the east of Chard is underway and an independent highway consultant, Mott MacDonald has been appointed to update the previous strategy. Several sites within the allocation are already under construction, several more are in planning progress.

- 4.34 Whilst I consider that the post of AHPM is a proactive response by the Council to addressing previous delivery issues within the District, it is too early to gauge to what extent the role has increased delivery as the officer has only been in post for approximately 6 months and some sites have been held up by the phosphates issue during this time. However, the work that has been done to date means that the Council is in a good position to improve delivery during the next monitoring year. phosphates

- 4.35 The phosphates issues in the District relates to advice from Natural England regarding the unfavourable condition of the Somerset Levels and Moors Ramsar Site. Further information about this is included within the proof of David Kenyon

- 4.36 Whilst a response to the issue has now been progressed (in the form of a phosphate calculator which was updated in March 2021, the outcomes of which will dictate what mitigation is required to bring sites forward), a cautious approach has been taken to the Council to the likely delivery of sites which are within the areas of the District affected by the phosphates issue.



4.37 Now that an agreed response is in place, the likely delivery of any sites which have been affected by this issue will be reassessed by the Council in the next calculation of the five year housing land supply position (which will have the base date of 31 March 2021). This has the capacity to increase the supply of deliverable housing sites in the District within the 5 year period.

CONCLUSION

4.38 Having assessed the position, I am confident that the Council is using the correct and up to date definitions of windfall sites and deliverable sites, as set out in the NPPF (2019). The Council has applied the necessary sense checks to the information that has been provided by developers and has discounted this where appropriate (for example to take into account the position with phosphates as explained above). Additionally the Council has included a lapse rate (which is higher than the evidence suggests is necessary) on the basis that some sites may not deliver as planned.

4.39 On this basis, I concur with the Council's assessment of the 5 year housing land supply position which is set out in the table below.

FIVE YEAR HOUSING LAND SUPPLY CALCULATION

Total annual requirement including 5% buffer	725
Deliverable supply (based on projected completions from 2020/21 to 2024/25)	4,373
5 year Housing Land Supply	6.03 (4,373/725)
Surplus	748 (4,373-3,625)

DELIVERY OF AFFORDABLE HOUSING

4.40 The appellant's Statements of Case make a number of comments about an affordable housing backlog in the District. However, the Government's methodology for calculating the LHN is clear that the affordability adjustment which is an integral part of the calculation takes account of any backlog and it is not, therefore necessary, to address this matter separately.



4.41 The weight to be given to the affordable housing that would be provided if the appeal proposals were permitted, is a matter for the planning balance exercise which is included within the proof of David Kenyon.

COMMENTS ON THE APPELLANT'S STATEMENT OF CASE

4.42 The appellant's Statement of Case for the appeal sets out their view which is that the Council cannot demonstrate a five-year supply of deliverable housing land. This is unsubstantiated. The appellant makes reference to the incorrect buffer being applied and to an 'over ambitious trajectory which is unrealistic and unevidenced'.

4.43 Para 4.34 of the SoC states that if the Council wishes to demonstrate a five year supply of deliverable sites through their annual position statement, they must apply a 10% buffer and not the 5% buffer.

4.44 Annual position statements were introduced via the NPPF in 2018 and are a mechanism to 'fix' the five year housing land supply position, via submitting it to the Planning Inspectorate for Examination. Guidance on the process is set out in the Planning Practice Guidance Para: 012 Reference ID: 68-012-20190722.

4.45 The Council has not progressed an annual position statement. The appellant is incorrect in this regard. It is explained in paras 3.20 to 3.25 above that the correct buffer for the District is the 5% buffer in accordance with para 73 a of the NPPF.

4.46 No further details are given regarding which elements of the Council's trajectory are considered to be overoptimistic. There is no indication of which, if any, sites the appellant is likely to challenge. This information has not been provided by the appellant despite a number of requests. I am aware of requests made on 10 March 2021, 17 March 2021 and 23 March 2021. The appellant then agreed (in an email dated 26 March 2021) to circulate a first draft SoCG on 5YHLS matters early in the week beginning 29 March. This was then delayed until 'after Easter' in an email dated 31 March 2021. At the time of finalising this proof on 12 April 2021, a first draft of the 5YHLS SoCG had not been received,

4.47 I will therefore add to my evidence through a rebuttal once I have assessed any updated position set out by the appellant.



5 CONCLUSION AND SUMMARY

- 5.1 This proof sets out the current position with regard to the Council's housing requirement and housing supply.
- 5.2 I have independently assessed the Council's calculations in terms of the LHN and confirm that this has been prepared in accordance with Government guidance. I have explained the calculations within this evidence.
- 5.3 I have explained that due to the outcomes of the HDT, the Council has added a 5% buffer to the housing requirement in accordance with the NPPF.
- 5.4 I have also assessed the components of supply set out within the 5 year housing land supply schedules and confirm that the Council is using a robust and defensible methodology which takes into account the NPPF (2019) definitions of deliverable and windfalls.
- 5.5 I consider that the Council has taken a robust and rather cautious approach to the likely delivery of the large sites in the District, based on discussions with developers and agents, but discounting this where necessary due to the consideration of up to date planning information and, for example, the phosphates issue which has had an impact in some parts of the District.
- 5.6 The Council is working to address previous delivery issues through the recruitment of an Accelerated Housing Delivery Programme Manager. He is working with colleagues across the Council on a wide range of initiatives to improve housing delivery and this programme is making promising steps to improve housing delivery in the District.
- 5.7 The Council has a healthy land supply position at 1 April 2020, with a robust trajectory for the 5 year period.
- 5.8 The appellant has not, at this stage, provided any details of which, if any, components of the Council's housing land supply or delivery rates for specific sites that they are likely to challenge, despite a number of requests for this information to be provided. Any response to these requests will be the subject of future evidence.
- 5.9 I shall seek to agree as much common ground as possible with the appellant.