

Assessment of 5 Year Housing Land Supply Position (Response to Derby City Council submission dated 20th May 2016)

- 1.1 This representation identifies the Council's housing land supply position when taking into account a number of variables that in our opinion undermines the ability of the Council to achieve its stated supply of 5.39 years as stated in their letter of 19th May 2016.
- 1.2 The calculations have been made using the Sedgefield method, only, following that this approach is recommended by National Planning Policy Guidance.

Land Supply Based on Start Date of April 2016			
A	Deliverable Major Site Planning Permissions	2802	With Reference to Appendix G of Supplementary Information Appendices (May 2016). Including completions at Kingsway yet, deducting unit numbers based on more realistic build out rates and the lack of robust developer commitments, as well as trajectory for 2021-22.
B	Deliverable BF Sites	454	With Reference to Appendix G of Supplementary Information Appendices (May 2016). Challenging very optimistic competitions, particularly due to the constraints associated with the development of brownfield sites and the Council's historic difficulties to regenerate brownfield sites.
C	Deliverable GF Sites	983	With Reference to Appendix G of Supplementary Information Appendices (May 2016). We consider the delivery rates to be overly optimistic.
D	Deliverable Small Site Planning Permissions	340	20% Lapse Rate on Correct figure of 479 Minus 40 units from 2022.
E	Windfalls	375	Agreed
F	Losses	-140	Losses have been added in line with the Council's earlier assessment.
G	Total Supply	4814	

Sedgefield Requirement at 2016			
H	Total Requirement	11000	2011-2028 Agreed
I	Annual Requirement	647	11000 / 17 Agreed
J	Basic 5 Year Requirement	3235	647 x 5 Agreed
K	Shortfall	1237	Agreed
L	Requirement + Shortfall	4472	Agreed
M	20% Buffer	894	20% of 4472
N	Total Requirement	5366	Agreed
O	Annual Requirement	1073	5366 / 5 Agreed
P	5 Year Supply	4.49	Based on Supply Above

Land Supply Based on Start Date of April 2017			
A	Deliverable Major Site Planning Permissions	2764	With Reference to Appendix G of Supplementary Information Appendices (May 2016). Including recent permissions at Hackwood Farm and Burdett House yet, deducting unit numbers based on more realistic build out rates and the lack of robust developer commitments.
B	Deliverable BF Sites	517	With Reference to Appendix G of Supplementary Information Appendices (May 2016). Challenging very optimistic competitions, particularly due to the constraints associated with the development of brownfield sites and the Council's historic difficulties to regenerate brownfield sites. In our calculations we have applied a more appropriate start date based on lead in times for Rolls Royce Main Works and Rykneld Road.
C	Deliverable GF Sites	668	With Reference to Appendix G of Supplementary Information Appendices (May 2016). We consider the delivery rates to be overly optimistic.
D	Deliverable Small Site Planning Permissions	381	20% Lapse Rate on Correct figure of 479 minus 80 units from 2016.
E	Windfalls	375	Agreed
F	Losses	-140	Losses have been added in line with the Council's earlier assessment.
G	Total Supply	4565	
Sedgefield Requirement at 2017			
H	Total Requirement	11000	2011-2028 Agreed

I	Annual Requirement	647	11000 / 17 Agreed
J	Basic 5 Year Requirement	3235	647 x 5 Agreed
K	Shortfall	1214	Agreed
L	Requirement + Shortfall	4449	Agreed
M	20% Buffer	890	20% of 4449
N	Total Requirement	5339	Agreed
O	Annual Requirement	1068	5339 / 5 Agreed
P	5 Year Supply	4.27	Based on Supply Above

- 1.3 Our further analysis of the updated Derby City 5 Year Housing Land supply position has sought to correct errors, apply a realistic loss rate (not unreasonable for a city authority), and to provide a more realistic assessment of build out rates / delivery from major brownfield and greenfield sites which do not yet have planning permission in place. Using the Council's own updated supply calculations, between 32% and 38% of its five year housing land supply does not yet have planning permission in place, and between 10% and 12.5% are brownfield sites without planning permission. Based on a 2016 starting point the Council anticipates that 5.5% of total supply will be delivered in 2017 from sites that do not yet have a planning permission in place.
- 1.4 The Council delivery record from brownfield sites is poor and does not suggest such rates of completion are realistic. While we have sought to reflect the Councils pattern of delivery in our re-estimate of 5 year housing supply for consistency and to enable an easier comparison, in fact, the Councils estimates for delivery from sites that do not yet have planning permission is considered to be wildly optimistic and overstated. To place such heavy reliance on sites that have not yet been fully assessed, through process, for deliverability imposes a massive risk to the delivery of the trajectory and does not give the 5 year housing supply calculation sufficient credibility to be relied upon.
- 1.5 This significant delivery doubt, coupled with our own re-calculations of supply must give serious cause for concern and on the balance of probabilities, strongly points to a significant shortfall in supply, that will need to be supported by the identification of additional demonstrably deliverable sites.