

Dear Sir Madam

Thank you for your query regarding the Stockton-on-Tees Five Year Deliverable Housing Land Supply Report. Your correspondence raises four issues. Firstly you point out that the five year supply report did not take into account the supply from empty homes. Secondly you also point out that the report does not take into account the increased quantum of development that has now, subject to the signing of a Section 106 Agreement (a type of legal agreement required for some developments), been approved at Allens West. Thirdly, you point out that the report did not reference recent planning permissions for small projects. Fourthly you query why the report is not undertaken on a rolling basis rather than being a snapshot in time. This point arises from your second and third points.

The National Planning Policy Framework (NPPF) requires local planning authorities to 'identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.' The NPPF adds that 'To be considered deliverable, sites 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 and in particular that development of the site is viable.'

Whilst it is not explicitly stated, I believe that when 'deliverable sites' are referred to in the NPPF, what is being referred to is housing sites as such; that is to say land available for housing development that is also suitable and achievable. I do not believe it is the Government's intention for this to include bringing empty properties back into use. Moreover empty properties were taken into account when determining the annual average housing requirement of 555 dwellings through a vacancy rate. There is a need for a certain number of vacant properties to allow for turnover in existing dwelling stock. Bringing properties back into use is part of the normal 'churn' in the housing market and distinct from additions to the dwelling stock as the properties already form part of the dwelling stock. I do not therefore, believe it would be valid to count bringing empty properties back into use as part of the five year supply of housing as it would effectively be double counting. I would further point out that if bringing empty properties back into use were to be included so would properties becoming vacant over each 12 month period as the housing requirement is a 'net' requirement; that is to say it is net of demolitions and losses. This would be virtually impossible to monitor as whilst it is possible to monitor a snapshot of how many properties are vacant at any given point; a property can be vacant for 1 day, 1 month, 3 months, 3 years and so on.

The quantum of residential development permitted at Allens West has increased from 500 to 850 dwellings, subject to the signing of Section 106 Agreement. When the agreement is signed then the overall quantum of development will be higher. However, it is not clear that that the quantum which will be delivered within 5 years will be any higher than with the current projected phasing.

I think your third and fourth points overlap so I will discuss them together. The base date for the annual five year housing land supply report is the 1st April each year. It is standard practice in local authorities to update this on an annual basis as there is a significant amount of officer time required for the exercise. It is not simply a case of adding in new planning permissions. A significant amount of work goes into collating and assessing all the relevant data and information regarding demolitions/losses, completions, development phasing etc. If the authority were to update the report more frequently then it would not simply be a case of adding in new planning permissions and stating that the supply had increased. For example, if the report were to be updated using a base date of 1st August (a quarterly review) then an additional 3 months housing requirement (about 138 dwellings) would have to be added as it would be a 5-year supply requirement from that point. Consideration is being given as to whether it would be practicable to add in a 'windfall' allowance for small sites in a future update. However, even if it is considered to be practicable it would certainly not be of a scale sufficient to close the current gap in the 5 year supply requirement of 573 dwellings.

Yours faithfully

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