

Liverpool or Sedgefield ?

There are a number of reasons why the Sedgefield approach provides the most appropriate means of dealing with any shortfall and they are summarised below:

1. The PPG firmly promotes the Sedgefield approach as the most appropriate method: *"Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'."*¹ The choice is not between Sedgefield and Liverpool, but between Sedgefield, and re-distributing need to other authorities where it cannot be met in the first 5 years. The guidance was reiterated in the attached letter (annexe 1).

It might be argued that the paragraph doesn't prevent the application of the Liverpool approach; the plain wording of the paragraph does not appear to support that interpretation. Further, insofar as the Judgment in Bloor Homes is concerned, the PPG wasn't in force at the time argument was heard in December 2013.

At the very least, the paragraph creates a strong presumption in favour of the Sedgefield approach, and if the Council wants to rebut it, they must have compelling evidence and reasons to demonstrate that it is not possible to meet the shortfall in the first 5 years of the plan.

2. The first point the Council make is that they are reliant on Weston Villages – a large urban extension to supply a significant proportion of the housing. Reliance on urban extensions that are planned to come forward later in the plan period, and where no alternatives exist, may be a reason to apply the Liverpool methodology. However,
 - (i) we are now half way through the plan period;
 - (ii) completions were first recorded in 2011 / 12, and development is well underway;
 - (iii) the Council's evidence at the examination is that units are coming forward at a rate of knots as well as delivering the jobs led strategy;
 - (iv) the Weston Villages development account for 30% of the supply. There is not reason or evidence why the other 70%, or a significant proportion at least, could not come forward to assist with meeting the shortfall if there was slippage with the Weston Villages.

The Council can't have it both ways – it can't express unbridled confidence in the delivery of the Weston Villages and at the same time promote the Liverpool method. Furthermore, there is already a trajectory in respect of the Weston Villages, and having regard to that, the Council still considers that it

¹ ID 3-035-20140306

can demonstrate a five year housing land supply – even on the Sedgefield approach.

3. The second point the Council make is that a new target came forward late on in the plan period, and they are now having to catch up. The error made at the start of the plan process in relation to the housing requirement is not a reason to suppress the rate at which housing should come forward – quite the opposite, it is a reason to boost the supply of housing as soon as possible because the need has already arisen, and has not yet been met. While the Inspector has expressed the view that this is a 5% authority, the fact remains that there is significant unmet need. It is well recognised that neither the buffer, nor a requirement to make up the shortfall within the first 5 years is a punishment for local authorities – it simply acknowledges the fact that housing has not kept up with the need and that there is a need to boost delivery.
4. It is inappropriate to suppress the delivery of housing, or at least lower the expectation of delivery because the Core Strategy figure of 20,985 is a minimum, and the Council should be taking positive steps towards exceeding it, not simply looking to meet it. The Sedgefield approach will assist in that aim.
5. The Council say that they have a five year housing land supply even on the Sedgefield approach. Again, the Council cannot have it both ways, and it has not demonstrated why the Sedgefield approach is not appropriate, and cannot be satisfied.

In the examination into CS13 Inspector Punshon said in relation to this examination:

“60....If at that time the Council considers that, if backlogs are to be addressed in the first few years, the annual housing requirement would be so high that it could not possibly be met it would need to make that argument to the examining Inspector.”

That is not the Council's case. What the Council say in their Hearing 2 Statement is that:

“Given the priority to restore the five year supply position, planning permissions have been granted on sustainable sites in parallel with the plan making process.”

That can only be a positive thing.

6. The Inspector has indicated that on the current evidence, there is a question mark over delivery against the Core Strategy requirement. We agree – the answer is not then to put the problem off, and place reliance on delivery later on in the plan period when there is no guarantee that the homes needed will

come forward. The Sedgefield approach will reveal any delivery problems early on in the period, and we are confident that flexibly worded policies can provide the mechanism to encourage delivery of the housing required to meet the requirement and the shortfall within the five years.



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Our Ref: 1565232
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Dear Mr Wilding,

Thank you for your letter of 27 October 2015 to Brandon Lewis MP, seeking clarification of whether local authorities should be using the Sedgefield or the Liverpool approach to calculating their five year housing land supply for planning purposes. I have been asked to reply on the Minister's behalf.

I hope you will appreciate that I am not able to comment on the merits of the planning applications which are currently being considered by North Somerset District Council, or the apparently conflicting views of Case Officers on what is the most appropriate method for calculating the five year land supply position. However, the Government's planning guidance states that local planning authorities should aim to deal with any undersupply within the first five years of the plan period, where possible. Where this cannot be met in the first five years, local planning authorities will need to work with neighbouring authorities under the duty to co-operate.

This can be found at Paragraph: 035Reference ID: 3-035-20140306 in the Assessment of Land Availability section of the planning guidance at:-
<http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/>

Thank you, once again, for writing.

Yours sincerely

PAUL WILLIAMS

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EXECUTIVE OFFICER