

# Northumberland Strategic Housing Land Availability Assessment (SHLAA 2021-2036)

including Five-Year Housing Land Supply of Deliverable Sites (2021-2026)

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# **Executive Summary**

### **Housing Completions and Commitments**

Completions 2016-2021:	7,730 net additional dwellings (av. 1,546pa)
	including 1,365 affordable homes (av. 273pa) = 17.7%
Outstanding permissions:	13,356 net additional dwellings (59.9% on sites under construction)
Other commitments:	27 net additional dwellings 'minded to approve' (subject to S106)
	plus 989 dwellings 'minded to approve' (matters to be resolved + S106)

#### **Housing Delivery Test**

HDT result 2018-2021: 280%

...thus only required to apply a 5% buffer to the 5-year housing land supply requirement

### Local Housing Need (standard methodology)

LHN 2021-2031:	614 net additional dwellings per annum (minimum)
derived from the 2014-based	household projections (2016) and latest 2020 affordability ratio (2021)

#### Five-Year Housing Land Supply ('deliverable' sites)

5-year supply requirement 2021-2026:	3,224 net additional dwellings (LHN with 5% buffer)
5-year housing land supply identified:	8,089 net additional dwellings
	including 500 from small sites allowance (av. 100pa)
5-year housing land supply 2021-2026:	<b>12.5 years</b> (251% of the minimum requirement)
	(11.6 years against the Northumberland Local Plan)

#### SHLAA Housing Land Supply ('deliverable' and 'developable' sites)

SHLAA supply requirement 2021-2036:	9,210 net additional dwellings (LHN-based minimum)
	(9,970 against the Northumberland Local Plan)
SHLAA housing land supply potential:	18,482 net additional dwellings 2021-2036
	including 1,500 from small sites allowance (av. 100pa)
	plus a contingency supply of a further 2,712 dwellings
	plus a further 2,105 dwellings forecast for beyond 2036

# 1. Introduction

- 1.1. The preparation of a Strategic Housing Land Availability Assessment (SHLAA) and identifying a five-year supply of 'deliverable' housing sites are requirements of Government planning policy, as set out in the <u>National Planning Policy Framework</u> (NPPF, revised July 2021)<sup>1</sup>. Supporting national <u>Planning Practice Guidance</u> (PPG) on <u>Housing and Economic Land Availability Assessment</u> provides a framework methodology for local authorities to follow when compiling them.
- 1.2. The SHLAA is a key part of the evidence base informing the preparation of the development plan and its ongoing monitoring. It sets out the potential future supply of housing land in the county, identifying whether sites may be potentially suitable, available and achievable over the plan period (or at least the next 15 years) for possible housing development, with an indicative estimate of how many homes each site might be able to provide. Realistic assumptions are applied regarding the potential suitability, availability and achievability (including economic viability) of each site, as well as prospective housebuilding delivery rates. Suitable sites that are available now and potentially achievable for some housing completions within the next five years are termed as being 'deliverable' and thus contribute to meeting the county's need to maintain a 5-year housing land supply. Suitable sites not currently available for development and/or on which new housing is unlikely to be achievable within the next five years (but which may become deliverable at a later point in the plan period) are termed as 'developable'. Indicative site densities and capacities are quantified to determine an approximate housing yield for each site. The potential overall delivery is then forecast for all sites that demonstrate capacity for possible future housing development over the plan period.

### The Northumberland SHLAA is <u>not</u> a development plan policy document.

While the SHLAA identifies land with the theoretical potential to accommodate housing development in Northumberland, it does <u>not</u> determine whether a site should necessarily be allocated for housing as part of the statutory Development Plan or be granted planning permission for housing. Before being allocated, sites without planning permission will require further testing through a site selection process and will be subject to the detailed requirements of a planning application.

The SHLAA does <u>not</u> preclude sites from being developed for other suitable uses and does <u>not</u> preclude other sites which have not been submitted or assessed from coming forward for possible housing development, subject to the determination of a suitable planning application.

<sup>&</sup>lt;sup>1</sup> NPPF Chapter 5: *Delivering a sufficient supply of homes -* para.68 and 71 re. *Identifying land for homes* and para.73-75 re. *Maintaining supply and delivery*. See also Chapter 2: *Achieving sustainable development -* para.11 (with footnotes 7-8) and 14 re. the 'presumption in favour of sustainable development' and the status of neighbourhood plans; and Chapter 11: *Making effective use of land -* para.119, 121-122 and 125.

- 1.3. In summary, the scope of the SHLAA assessment is to:
  - identify sites and broad locations with potential for future housing development;
  - assess their suitability for housing development (on a largely policy-neutral basis) and the likelihood of development coming forward (their availability and achievability); and
  - make an assumption of how many homes could potentially be accommodated on the sites if they were to be ultimately developed for housing (their indicative dwelling capacity or yield).

### Purpose of the SHLAA Report

- 1.4. The Northumberland SHLAA is a key part of the evidence base that underpins the housing site allocations in the Northumberland Local Plan. The SHLAA seeks to identify a supply of 'deliverable' and 'developable' sites to meet the county's identified housing requirements over at least the next 15 years of the plan period (i.e. 1 April 2021 31 March 2036), including a supply of specific 'deliverable' sites to meet housing requirements over the next five years (i.e. that are suitable, available now and with at least some completions achievable between 2021-2026). For the years 6-10 and 11-15, the supply can include a mix of specific 'developable' sites (i.e. suitable, but not currently available and/or not likely to deliver any completions within the next five years) and broad locations for growth for possible future housing development. Where possible, longer-term supply is also identified beyond the Northumberland Local Plan's plan period 2016-2036.
- 1.5. The NPPF (paragraph 11d with footnote 8, plus paragraph 14c) and PPG<sup>2</sup> advise that if a local planning authority is unable to demonstrate a 5-year housing land supply (with an appropriate buffer allowance) to meet the identified immediate needs in its area, then the '**presumption in favour of sustainable development**' will come into effect in the determination of planning applications for housing development. PPG<sup>3</sup> nevertheless advises that weight can still be given to relevant policies in emerging and 'made' neighbourhood plans where the local planning authority cannot demonstrate a 5-year supply.

### Northumberland SHLAA Baseline, Updates and Outcomes

1.6. This Northumberland SHLAA Report draws upon the previous SHLAAs, and updates the analysis to a **base date of 31 March 2021**. It should be noted that it therefore reflects analysis of the position prior to the recent adoption of the Northumberland Local Plan (adopted 31 March 2022), although analysis is also provided in terms of the Local Plan's housing requirements. Importantly, the SHLAA provides evidence to support the monitoring of the Local Plan and regularly assess the county's future housing land supply, to ensure that the requirement for new homes can be delivered in line with the overall strategic vision and housing policies, and thus will help to inform future Plan reviews.

<sup>&</sup>lt;sup>2</sup> PPG re. <u>Plan-making</u> (March 2019, paragraph 067).

<sup>&</sup>lt;sup>3</sup> PPG re. <u>Neighbourhood Planning</u> (September 2018, paragraphs 082-083, 096-097 and 099).

- 1.7. In providing an update to the previous SHLAAs, this report
  - sets a base-date of 31 March 2021 for key statistical and quantitative information.
  - identifies the potential housing land supply over three five-year periods 2021-2026, 2026-2031 and 2031-2036, as well as beyond the Local Plan's plan period.
  - was informed by the combined Strategic Housing & Employment Land Availability Assessment (SHELAA) 'call for sites' consultation undertaken in early 2018, which invited developers, landowners, agents and other interested parties to put forward sites with supporting information for consideration in the preparation of the new Northumberland Local Plan.
  - has involved a review and update of previously submitted and assessed SHLAA sites, together with other new sites that have come forward since the previous SHLAA was prepared, as well as taking account of updated assessment work required by the Planning Inspector as part of actions arising through the ongoing independent examination of the Local Plan to roll forward the 5-year supply and SHLAA.
  - has been informed by additional regular targeted consultation with developers/landowners/agents relating to their latest anticipated year-by-year housebuilding delivery rates on large and medium-sized sites, the latest round of which took place between 23 June - 23 July 2021, with subsequent follow-up liaison as necessary to gain the most up-to-date information possible.
  - is prepared according to the agreed methodology (see Section 4), which includes a reconsideration of the assessment of Green Belt sites and other sites outside of settlement boundaries to better reflect the Northumberland Local Plan's spatial strategy which considers there to be no need to release Green Belt land for housing development in order to meet the county's updated housing requirements.

### Impacts of the Covid-19 pandemic

- 1.8. It should be noted that the up-to-date housing delivery evidence informing the preparation of this SHLAA and 5-year housing land supply update now reflects the impacts of the Covid-19 coronavirus pandemic lockdowns, in particular the first lockdown that led to the temporary pausing of construction activities on the majority of housing development sites across the country between 23 March 2020 and the resumption of activities from 18 May 2020.
- 1.9. While it did not impact significantly on delivery at the end of the 2019/20 monitoring year, this temporary hiatus and slowdown in construction works inevitably affected housing delivery rates during the first few months of the 2020/21 monitoring year, such that delivery on many sites was somewhat lower than had been previously

forecast for the year by developers<sup>4</sup>. However, the Council's analysis of dwelling completions and commencements indicated that housing delivery rates in Northumberland had pretty much returned to typical monthly levels by September 2020, and while overall delivery during 2020/21 was down on recent years it was ultimately still significantly higher than the Local Plan's annual average housing requirement and around double the latest baseline minimum Local Housing Need.

# 1.10. Hence this SHLAA and 5-year supply analysis represents a robustly evidenced post-Covid-19 lockdowns position.

# Study Area

- 1.11. The Northumberland SHLAA is a comprehensive assessment of sites within the administrative area of Northumberland County Council, excluding Northumberland National Park which is a separate Local Planning Authority area.
- 1.12. As well as primarily setting out forecast delivery at a countywide level, this report presents the results of the SHLAA site assessments according to the four Delivery Areas identified in the new <u>Northumberland Local Plan</u>, although it should be noted that the 5-year housing land supply is only measured at the countywide level.
- 1.13. The SHLAA considers all sites within the county that comply with the criteria for inclusion. The site size threshold for inclusion in the SHLAA is that the site is large enough to demonstrate capacity to potentially deliver five-or-more self-contained dwellings (i.e. circa 0.2ha). Smaller sites are nevertheless taken into account through the use of an appropriate 'windfall' allowance.

# Structure of the Report

1.14. This report firstly considers the planning policy context for the SHLAA in terms of establishing the housing land supply requirements to be assessed against, before also considering the current position with outstanding housing commitments across the county. It then details the methodology applied for the assessment of sites in this revised 2021 study. The results and findings of this updated work are detailed in Section 5 of the report. Further information is available in a range of supporting appendices, including at a detailed site-specific level.

<sup>&</sup>lt;sup>4</sup> A recent Planning Inspectorate <u>appeal decision</u> confirmed that the 5-year housing land supply is concerned only with the capacity of 'deliverable' sites, and that figure is entirely separate from the number of dwellings actually built and occupied. The Inspector also added that the provisions in the NPPF that trigger the 'tilted balance', and with it the presumption in favour of sustainable development, relate only to the housing capacity of sites and their deliverability, meaning that forecasts of the pandemic's effects on actual housing delivery are therefore not directly relevant to this exercise.

# 2. Housing Land Supply Requirements

# Local Housing Need

- 2.1. To help establish a more consistent approach to identifying local planning authority housing requirements across the country, the NPPF<sup>5</sup> (July 2021) and supporting PPG on <u>Housing and Economic Needs Assessment</u> (December 2020) set out a standardised methodology for calculating Local Housing Need. This process has effectively replaced the previous role of the Strategic Housing Market Assessment (SHMA) in establishing a local authority's objectively assessed housing needs.
- 2.2. This approach is based on a calculation that uses the most recent official ONS household growth projections at the starting point, with an uplift adjustment to take account of market signals and housing demand, as well as to reflect any past under-delivery, derived from the latest official ONS affordability ratio comparison of median house prices to median gross workplace-based earnings (assuming basic affordability at four times household income).
- 2.3. The minimum Local Housing Need calculation therefore changes at least annually when updated ONS affordability ratios are published each spring, as well as when the ONS releases its biennial sub-national household projections (corresponding to its latest sub-national population projections).
- 2.4. However, following Government reviews of the Local Housing Need methodology formula during autumn 2018<sup>6</sup> and summer/autumn 2020<sup>7</sup>, the NPPF and PPG<sup>8</sup> updates advised that local authorities should for the present time ignore more recent sub-national household projections<sup>9</sup> for the purposes of calculating the minimum Local Housing Need, and revert to using the MHCLG <u>2014-based sub-national household projections</u> instead.
- 2.5. The ONS <u>affordability ratios</u> of median house prices to median gross workplacebased earnings for 2020 (as applicable for this SHLAA and 5-year housing land supply analysis of the position at 31 March 2021) were released on 25 March 2021.
- 2.6. These 2014-based household projections and 2020 affordability ratios therefore inform the future minimum requirements in this SHLAA and 5-year housing land supply analysis.

<sup>&</sup>lt;sup>5</sup> NPPF Chapter 5: *Delivering a sufficient supply of homes* - para.61.

<sup>&</sup>lt;sup>6</sup> <u>Technical consultation on updates to national planning policy and guidance</u> (MHCLG, October 2018).

<sup>&</sup>lt;sup>7</sup> <u>Changes to the current planning system</u> (MHCLG, August 2020).

<sup>&</sup>lt;sup>8</sup> PPG re. <u>Housing and Economic Needs Assessment</u> (December 2020, paragraphs 004-005).

<sup>&</sup>lt;sup>9</sup> ONS released their <u>2016-based sub-national household projections</u> on 20 September 2018, informed by their <u>2016-based sub-national population projections</u> (released on 24 May 2018). Further updated <u>2018-based sub-national household projections</u> were released on 29 June 2020, informed by the <u>2018-based sub-national population projections</u> (released on 24 March 2020).

- 2.7. Previous Local Housing Need figures nevertheless remain relevant in terms of the housing trajectory for the monitoring years 2016-2021<sup>10</sup>.
- 2.8. Northumberland's current Local Housing Need calculations<sup>11</sup> for 2021-2031 are therefore set out in Figure 1 below. The 2014-based household projections suggest that Northumberland would be likely to see a household growth rate of +5,457 households over the next 10 years at an average +546 households per annum, while median house prices in the county consistently average more than six times the average salary according to the most recent 2020 affordability ratios (6.009).

### Figure 1: Northumberland Local Housing Need Calculation (March 2021)

Local Housing Need =  $(1 + \text{local affordability ratio adjustment factor}) \times \text{projected household growth}$ ...where the Adjustment Factor =  $\left( \frac{(\text{local affordability ratio - 4})}{4} \right) \times 0.25$ 

	Current 2021	10yr Projected Household Growth 2021-2031				
	Estimate	Projection to 2031	Projected Growth	Growth per annum		
Households Projection (2014-based)	144,860	150,317	+5,457	+546 pa		

Source: MHCLG 2014-based sub-national household projections (July 2016)<sup>12</sup>

#### Affordability Ratio (ONS, March 2021):<sup>13</sup>

Northumberland median house price (2020)	=	£164,000
Northumberland median gross annual workplace-based earnings (2020)	=	£27,292
Northumberland Local Affordability Ratio (2020)	=	6.009
Northumberland Adjustment Factor = $\begin{pmatrix} (6.009 - 4) \\ 4 \end{pmatrix} \times 0.25$	=	0.126
Minimum Local Housing Need (March 2021):		
Northumberland Local Housing Need = (1 + 0.126) x 546	=	614 dwellings pa
Local Housing Need increase above projected 10-year household growth	=	12.56% (ie. no cap applicable)

<sup>&</sup>lt;sup>10</sup> Planning for the Right Homes in the Right Places consultation proposals (DCLG, September 2017) calculated Northumberland's initial baseline Local Housing Need as an average 707 net additional dwellings per annum for the initial 10-year period 2016-2026, derived from the MHCLG 2014-based household projections and ONS 2016 affordability ratio. Updated 2017 affordability ratios (ONS, April 2018) effectively revised this figure to 717pa for 2016-2026, which set the minimum LHN for the base point of the new Northumberland Local Plan's plan period 2016-2036, while also giving a 2017-2027 minimum LHN of 699pa. The ONS 2016-based household projections (September 2018) gave a 2018-2028 LHN of 558pa, but with the Government's methodology subsequently reverting to using the previous 2014-based household projections for the purposes of calculating LHN that changed to 667pa in February 2019. The updated 2018 affordability ratios (ONS, March 2019) then set a revised 2018-2028 LHN figure of 694pa, and a 2019-2029 figure of 676pa. The 2019 affordability ratios (ONS, March 2020) then revised the 2019-2029 LHN to 672pa, and set the 2020-2030 LHN of 651pa.

<sup>&</sup>lt;sup>11</sup> Local Housing Need minimum annual requirement figure for a 10 consecutive years period of change, with a base date of 1<sup>st</sup> April of the current year, and using the affordability ratio for the previous calendar year.

<sup>&</sup>lt;sup>12</sup> <u>https://www.gov.uk/government/collections/household-projections</u> - the projected households figure is derived from the projected household population numbers (taking into account average household size), which is a sub-set of the total projected population excluding the population numbers projected to be living in non-household institutional/communal forms of accommodation.

<sup>&</sup>lt;sup>13</sup> <u>https://www.ons.gov.uk/releases/housingaffordabilityinenglandandwales2020</u> (Tables 5a-c).

- 2.9. The calculation therefore results in a minimum Local Housing Need for an average +614 net additional dwellings per annum in Northumberland over the next 10 years (i.e. a minimum +6,140 net additional new homes needed between 2021-2031).
- 2.10. The PPG methodology advises that a cap may be applied on the Local Housing Need to help ensure that this unconstrained assessment of the number of homes needed in an area is deliverable, dependent on the status of the authority's local plan. In Northumberland's case, in the absence of an adopted plan in the last five years<sup>14</sup>, the cap would be at 40% above the projected household growth (546pa over the 10 years period), giving a capped level of 764 dwellings per annum. The calculated minimum Local Housing Need figure of 614 dwellings per annum taking into account the market signals uplift adjustment for affordability is only 12.56% above the projected household growth for the 10-year period, so no cap is needed.
- 2.11. The PPG<sup>15</sup> confirms that the 10-year annual average net additional dwellings figure generated by the standard method can be equally applied across the whole plan period (minimum 15 years) by rolling the same figure forward. While the ONS projections suggest that the rate of population growth in Northumberland will continue to decrease and level off over the next 20 years, continually reducing average household sizes mean that there is still a projected growth in the number of households, albeit at a gradually decreasing rate towards the end of the plan period and beyond.
- 2.12. It should be noted that this minimum Local Housing Need figure effectively applies to the whole of Northumberland county including the Northumberland National Park Authority's separate administrative area, given that no individual sub-divided population and household projections are provided for national park authorities.

# Northumberland Local Plan Housing Requirements

- 2.13. The PPG advises that the standard method identifies a minimum annual housing need figure, but does not produce a housing requirement for the purposes of planmaking. While there is an expectation that the standard method will be used, in exceptional circumstances the PPG<sup>16</sup> provides for justifiable deviations from the standard method for considering additional growth scenarios above the historic trends identified through the household projections and thus establishing alternative higher housing need figures and net additional dwellings requirements in the local plan.
- 2.14. The Northumberland Local Plan seeks a greater level of housing to support local and regional economic growth, effectively representing an uplift from the minimum Local Housing Need albeit not derived directly from it. It sets out a corresponding

<sup>&</sup>lt;sup>14</sup> The Northumberland Local Plan 2016 to 2036 was adopted on 31 March 2022, after this SHLAA and 5year supply analysis was undertaken in relation to the position as at 31 March 2021.

<sup>&</sup>lt;sup>15</sup> PPG re. <u>Housing and Economic Needs Assessment</u> (July 2019, paragraph 012).

<sup>&</sup>lt;sup>16</sup> PPG re. Housing and Economic Needs Assessment (July 2019, paragraph 010) and PPG re. Housing Supply and Delivery (July 2019, paragraph 001).

Objectively Assessed Need-based requirement for a minimum 17,700 net additional dwellings over the 20-year plan period 2016-2036, equating to an annual average 885 dwellings per annum. Importantly, this is <u>not</u> a requirement to deliver a minimum 885 net additional dwellings in each and every year, so some years can be lower if other years are higher to balance out overall.

- 2.15. Northumberland County Council has recorded a total of 7,730 net additional dwellings completed in the first five years<sup>17</sup> of the Local Plan period 2016-2021 (average 1,546pa) including 1,365 (17.7%) affordable homes (average 273pa), and with about 35% of new housing being delivered on previously-developed 'brownfield' sites. This leaves a residual 9,970 net additional new dwellings required over the remaining 15 years of the 20-year plan period to meet the Plan's minimum total 17,700 requirement, at a residual pro rata annual average of 665pa.
- 2.16. However, this monitoring has a base date for the position at 31 March 2021 and thus precedes the adoption of the Northumberland Local Plan. The NPPF (para.74) and PPG<sup>18</sup> advise that, in the absence of an adopted local plan within the last five years and where the housing need figure needs revising, the standard methodology's minimum Local Housing Need should be used for measuring the 5-year housing land supply. Comparisons against the new Local Plan's OAN-based requirement are nevertheless provided in the analysis for information. However, while the Local Housing Need sets the basis for the 5-year supply and may serve as a starting point for determining housing requirements, the PPG<sup>19</sup> implies that the overall SHLAA should identify sufficient sites (and broad locations) measured against objectively-assessed needs, including the identified Local Housing Need.

# Housing Delivery Test

- 2.17. In determining the 5-year housing land supply requirement, the NPPF (paragraph 74) and PPG<sup>20</sup> sets out that, from November 2018, the level of buffer allowance for past under-delivery to be provided for is now to be determined by the authority's Housing Delivery Test result, and whether or not the authority is seeking to have its 5-year supply formally 'confirmed' by the Planning Inspectorate through the examination of a local plan or subsequent annual position statement.
- 2.18. The Housing Delivery Test (HDT) is the Government's annual means of measurement of local authorities' housing delivery performance, using a percentage measurement of how the number of net additional homes delivered over the previous three years compares to the authority's minimum housing requirement for that period<sup>21</sup>.

<sup>&</sup>lt;sup>17</sup> <u>Net Additional Homes Provided in Northumberland 2020-2021</u> (June 2021).

<sup>&</sup>lt;sup>18</sup> PPG re. <u>Housing Supply and Delivery</u> (July 2019, paragraphs 003-005 and 027).

<sup>&</sup>lt;sup>19</sup> PPG re. <u>Housing and Economic Land Availability Assessment</u> (July 2019, paragraph 025).

<sup>&</sup>lt;sup>20</sup> PPG re. <u>Housing Supply and Delivery</u> (July 2019, paragraphs 022 and 042).

<sup>&</sup>lt;sup>21</sup> Housing Delivery Test Measurement Rule Book (July 2018).

2.19. Northumberland's first three Housing Delivery Test results were 197% for the 3-year period 2015-2018, 239% for 2016-2019 and 257% for 2017-2020<sup>22</sup>. The county's HDT calculations and result<sup>23</sup> for the past 3-year period 2018-2021 are set out in Figure 2 below, based on the Government's adjusted approach to reflect the continued impacts on delivery during and immediately following the first Covid-19 coronavirus lockdown (23 March and 18 May 2020) up to the end of July 2020.

	Net Additional Dwelling Completions in previous 3 years <sup>24</sup>	Student Communal Accommodation - net additional bedroom units in previous 3 years <sup>25</sup>	commodation Accommodati et additional - net addition room units in bedroom units		n Delivery I 2018-2021 in	
Housing Delivery <sup>27</sup>	4,824	0 / 2.5 = <b>0</b>	88 / 1.8 <b>= 48.9</b>		<b>4,873.9</b> (av. 1,625 pa)	
	Local Housing Need	Neighbouring Local Authorities' Unmet Housing Needs		Total Housing Need 2018-2021		
2018/19 <sup>28</sup>	685.8	-		685.8		
<b>2019/20<sup>29</sup></b> (11 months)	(676 / 366) x 335 = 618.7	-		618.7		
<b>2020/21<sup>30</sup></b> (8 months)	(651 / 366) x 243 = 433.4	-			433.4	
Housing Need <sup>31</sup>	1,737.9	0			<b>1,737.9</b> (av. 579.3 pa)	

#### Figure 2: Northumberland Housing Delivery Test Calculations (2018-2021)

Housing Delivery Test (%)

<u>4,873.9 net additional homes delivered (2018-2021)</u> 1,737.9 homes required (2018-2021)

280%

=

<sup>&</sup>lt;sup>22</sup> Housing Delivery Test measurements (MHCLG / DLUHC).

<sup>&</sup>lt;sup>23</sup> Housing Delivery Test: 2021 measurement (DLUHC, January 2022).

<sup>&</sup>lt;sup>24</sup> Net Additional Dwellings figure: as per the local authority's annual Housing Flows Reconciliation submission to Government each September for their National Statistic.

<sup>&</sup>lt;sup>25</sup> Student Communal Accommodation figure: the net increase in bedrooms in student communal accommodation in the local authority area, divided by a nationally set ratio of the average number of students living in student-only households as taken from the previous England Census data. For the Census 2011 this ratio was 2.5.

<sup>&</sup>lt;sup>26</sup> Other Communal Accommodation figure: the net increase in bedrooms in other communal accommodation in the local authority area, divided by a nationally set ratio of the average number of adults living in households as taken from the previous England Census data. For the Census 2011 this ratio was 1.8.

<sup>&</sup>lt;sup>27</sup> Housing delivery figures include net additional completions within the Northumberland National Park area.

<sup>&</sup>lt;sup>28</sup> 2018/19 housing need = Local Housing Need for 2018-2028 derived from the 2014-based household projections and affordability ratio for 2017.

<sup>&</sup>lt;sup>29</sup> 2019/20 housing need = Local Housing Need for 2019-2029 derived from the 2014-based household projections and affordability ratio for 2018, but period reduced by 1 month (31 days) to reflect the temporary disruption caused by the first coronavirus national lockdown announced on 23 March 2020.

<sup>&</sup>lt;sup>30</sup> 2020/21 housing need = Local Housing Need for 2020-2030 derived from the 2014-based household projections and affordability ratio for 2019, but period reduced by 4 months (122 days) to reflect the temporary disruption caused by the first coronavirus national lockdown (23 March - 18 May 2020) and thereafter up to the end of July 2020 – Written Ministerial Statement: Housing Update (6 September 2021).

<sup>&</sup>lt;sup>31</sup> Housing Need figures (derived from the ONS sub-national population and household projections) are only provided for the county of Northumberland as a whole, and thus includes population and household growth within the Northumberland National Park Authority's administrative area.

- 2.20. In terms of actual housing delivery, Northumberland County Council recorded 4,822 net additional dwellings completed between 2018-2021<sup>32</sup> (at an annual average 1,607pa). There were 2 net additions recorded in Northumberland National Park Authority's area during 2018-2021. While there were no additions or losses in bedroom units in student communal accommodation in the county, there were 88 new bedroom units completed in other communal accommodation facilities during this period.
- 2.21. In circumstances like those in Northumberland where there has been no local plan adopted in the previous five years that establishes the local authority's housing requirement figure, the Housing Delivery Test measurement methodology applies transitional arrangements. This requires that the past 3-year delivery figure is compared to a 3-year housing need that is based on the minimum annual Local Housing Need figure.
- 2.22. The relevant 3-year household growth projection and Local Housing Need figures for Northumberland (as adjusted by the Government's HDT methodology) therefore equate to +1,737.9 additional households between 2018-2021 (at an average +579.3pa).
- 2.23. This gives a **Housing Delivery Test result of 280% for Northumberland for the 3-year period 2018-2021**. If the HDT methodology had not included the Covid-19 adjustments for 2019/20 and 2020/21, Northumberland's latest result would have been slightly lower at 240%, but still well above the required levels.
- 2.24. As recent housebuilding delivery rates in the county have been significantly in excess of the baseline housing need as determined by the household projections and Local Housing Need (or indeed the Northumberland Local Plan requirement), delivery is therefore well in excess of the 85% threshold indicated in the NPPF and Housing Delivery Test guidance below which a 20% buffer should be applied to the 5-year supply to reflect significant past under-delivery. Delivery in Northumberland is also therefore well in excess of the 75% threshold below which the 'presumption in favour of sustainable development' is triggered<sup>33</sup>, as well as above the 95% threshold below which the local planning authority would otherwise have to prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years.
- 2.25. Hence, in accordance with the NPPF and PPG, the Housing Delivery Test result means that **Northumberland only needs to allow for a 5% buffer to the 5-year housing land supply requirement** (brought forward from later in the Plan and SHLAA assessment period, rather than being additional to the overall requirement) to ensure choice and competition in the market for land.

<sup>&</sup>lt;sup>32</sup> Net Additional Homes Provided in Northumberland 2020-2021 (June 2021).

<sup>&</sup>lt;sup>33</sup> NPPF (footnote 8 and para.222) advises that the 'presumption in favour of sustainable development' applies for assessing planning applications for housing development where relevant development plan policies are out-of-date based on there being a lack of a 5-year supply of deliverable housing sites, or where the latest Housing Delivery Test result is more than 75% below the housing requirement for the previous 3 years.

2.26. The NPPF (paragraphs 74b and 75) and PPG<sup>34</sup> indicate that where a local planning authority optionally wishes to have their demonstrated 5-year supply of deliverable sites 'confirmed' by the Planning Inspectorate through the independent examination of a local plan (and thereafter through an annual land supply position statement with supporting engagement statement submitted to PINS), then a minimum 10% buffer allowance should be applied to the 5-year housing land supply requirement to provide flexibility and account for any fluctuations in the market during the year. Northumberland County Council did not, however, seek to have its 5-year housing land supply position formally 'confirmed' as part of the examination of the new Local Plan, so does not need to apply this higher 10% buffer to the 5-year supply requirement.

# SHLAA and 5-year Housing Land Supply Requirements

- 2.27. The PPG<sup>35</sup> advises that where the standard methodology is used **it is not necessary to factor in any allowance for previous levels of under-delivery**, since such past under delivery is reflected in the methodology's built-in affordability adjustment.
- 2.28. Figure 3 illustrates how the standard methodology's minimum Local Housing Need – which provides the basis for calculating the SHLAA and 5-year housing land supply requirements – compares to the Local Plan's overall and residual housing requirement for the remainder of the plan period. The corresponding SHLAA requirements for 'deliverable' and 'developable' housing land supply are set out, together with the 5-year 'deliverable' housing land supply requirements when factoring in a 5% buffer allowance. For this SHLAA, the minimum 15-year period aligns with the remaining 15 years of the Local Plan's plan period 2021-20236.

	Annual Average Net Additional Dwellings per Annum	5-year Housing Land Supply Requirement (2021-2026) with 5% buffer	SHLAA (15-year) Housing Requirement (2021-2036)	
Local Housing Need (2014-based 10yr requirement rolled forward pro rata)	614 pa	3,224	9,210	
Northumberland Local Plan	Residual: <b>665 pa</b> (Overall: 885 pa)	<b>3,489</b> (4,646)	9,970 (13,275)	

Figure 3: Northumberland Housing	I and Supply Paguiroments Comparison
Figure 5. Northumberiand nousing	J Land Supply Requirements Comparison

2.29. Northumberland therefore has a residual 15-year SHLAA requirement to identify sufficient 'deliverable' and 'developable' land for accommodating at least 9,210 net additional homes (against the 2014-based minimum Local Housing Need bottom of the range), with an integral 5-year housing land supply requirement to identify enough 'deliverable' sites to provide for at least 3,224 net additional homes. Against the Local Plan's OAN requirement, a residual 15-

<sup>&</sup>lt;sup>34</sup> PPG re. <u>Housing Supply and Delivery</u> (July 2019, paragraphs 009-010).

<sup>&</sup>lt;sup>35</sup> PPG re. <u>Housing and Economic Needs Assessment</u> (December 2020, paragraph 011).

year supply of 9,970 net additional homes would be required, including identifying a 5-year supply for a minimum 3,489 net additional homes.

2.30. It should be noted that, as the official population and household projections do not distinguish between the county of Northumberland and the Northumberland National Park area within it, these housing requirements are effectively for the county of Northumberland as a whole including the area separately governed by the Northumberland National Park Authority as an independent Local Planning Authority. However, given the National Park's protected status it is likely to only see very small numbers of new housing development within its area, and hence these effectively combined requirements are considered to be an appropriate basis for Northumberland County Council's SHLAA and 5-year housing land supply calculations. There is nevertheless no formal Duty to Cooperate agreement for the County Council to provide for any of the National Park Authority's housing needs are likely to be provided for by housing developments within the 'gateway settlements' just outside the National Park (Bellingham, Rothbury and Wooler).

# 3. Housing Permissions and Commitments

- 3.1. As at the end of March 2021, there were **outstanding planning consents for 13,356 net additional new homes** remaining to be built on permitted housing development sites within Northumberland. Numerically this therefore already exceeds the Local Housing Need-based and residual Local Plan housing requirements for the remaining 15 years of the plan period (see Figure 3), albeit the delivery of some homes on a few larger strategic sites is forecast to run beyond the plan period.
- 3.2. Figure 4 shows that, of these commitments, 12,455 dwellings were on 'larger sites' of five-or-more dwellings (11,474 full or outline permissions with reserved matters, plus 981 outline permissions), while another 901 permitted dwellings were on 'small sites' of less than five dwellings.
- 3.3. Nearly two-thirds (7,997 or 59.9%) of these outstanding permitted dwellings are on sites that are currently under construction, thus giving a reasonably strong level of confidence to their delivery.
- 3.4. 'Minded to approve' planning applications (i.e. the development has been approved in principle, but the final decision is subject to the final signing off of a S106 legal agreement) could add a further 27 dwellings into this committed supply<sup>36</sup>, thus bringing the total outstanding commitments to 13,383 dwellings. Further 'minded to approve' applications (i.e. still subject to outstanding issues yet to be resolved, plus the signing off of a S106) could potentially add up to another 989 dwellings<sup>37</sup>.
- 3.5. Six of the current 'made' neighbourhood plans in Northumberland allocate 27 sites for housing development between them, with an indicative combined capacity for in excess of 1,800 net additional dwellings<sup>38</sup>. 12 of these sites already have full or outline planning permission (including three Morpeth Neighbourhood Plan sites having been since permitted for significantly more homes than the 'made' Plan had anticipated, while two Alnwick & Denwick Neighbourhood Plan sites have ultimately become unavailable for residential development), while a few sites have already been built out, so these are therefore included within the completions figures in Figure 4. The remaining 13 neighbourhood plan housing site allocations yet to gain planning consent have an indicative allocated capacity for in excess of 300 net additional dwellings<sup>39</sup>.

<sup>&</sup>lt;sup>36</sup> 'Minded to approve' applications subject to a S106: Pegswood (27).

<sup>&</sup>lt;sup>37</sup> Other 'minded to approve' applications with outstanding issues still to be resolved and subject to a S106: three sites at Amble (500 + 166 dwellings – the latter ultimately gained outline permission in May 2021) and Cambois (323).

<sup>&</sup>lt;sup>38</sup> Neighbourhood Plan housing site allocations: Cramlington (33 dwellings on two sites); Hexham (approx. 20 on three additional sites not in the Northumberland Local Plan); Longhorsley (67 on two sites); Morpeth (approx. 1,129 total: Morpeth approx. 1,000 on one site + Pegswood 129 on three sites); Alnwick & Denwick (482 on 10 sites + two schools sites with unspecified capacity); Wooler (approx. 90 on four sites).

 <sup>&</sup>lt;sup>39</sup> Neighbourhood Plan housing allocation sites currently without planning consent: two sites in Cramlington (33 dwellings); one site in Hexham (5); one site in Longhorsley (12); one site in Pegswood (approx. 18); four sites in Alnwick (146); four sites in Wooler (approx. 90).

Delivery Area	Main Settlements (Parish-based)	Completions 2016-2021				Small Sites (<5	Total Outstanding
			Full	Outline	Sub-Total	dwellings)	Permitted Commitments
	Amble <sup>40</sup>	264	485		485	11	496
	Ashington	758	890	200	1,090	6	1,096
	Bedlington <sup>41</sup>	250	532		532	17	549
	Blyth	1,100	446	300	746	30	776
	Cramlington	839	2,353		2,353	2	2,355
South East	Choppington <sup>42</sup>	5	327		327	6	333
	Newbiggin-by-the-Sea	45	92		92	7	99
	Seaton Valley43	164	289		289	3	292
	Rest of Delivery Area	226	677		677	43	720
	South East sub-total	3,651	6,091	500	6,591	125	6,716
	Morpeth <sup>44</sup>	1,148	1,880	150	2,030	55	2,085
	Ponteland	302	215	16	231	54	285
	Corbridge	62	190		190	34	224
Central	Hexham	146	214		214	31	245
Gentral	Prudhoe	149	380		380	7	387
	Rest of Delivery Area	623	277	15	292	169	461
	Central sub-total	2,534	3,156	181	3,337	350	3,687
	Berwick-upon-Tweed45	117	934	30	964	27	991
	Belford	40	52		52	16	68
	Seahouses <sup>46</sup>	26	6	20	26	5	31
	Wooler	28	80	36	116	18	134
North	Alnwick47	370	488	15	503	19	522
	Rothbury <sup>48</sup>	74	67	78	145	21	166
	Rest of Delivery Area	705	445	113	558	221	779
	North sub-total	1,360	2,072	292	2,364	327	2,691
	Bellingham	19	31		31	4	35
	Haltwhistle	19	30		30	7	37
	Haydon Bridge	117	18		18	10	28
West	Allendale	13			-	17	17
	Rest of Delivery Area	121	76	8	84	61	145
	West sub-total	289	155	8	163	99	262
Northumb	erland Total	7,730	11,474	981	12,455	901	13,356

### Figure 4: Completions and Outstanding Planning Consents in Northumberland (as at 31 March 2021)

<sup>&</sup>lt;sup>40</sup> Amble parish incl. dwellings in Warkworth parish (North delivery area) that are within Amble settlement.

<sup>&</sup>lt;sup>41</sup> East Bedlington and West Bedlington parishes incl. Bedlington and Bedlington Station.

<sup>&</sup>lt;sup>42</sup> Choppington parish incl. Guidepost, Stakeford and Choppington.

<sup>&</sup>lt;sup>43</sup> Seaton Valley parish incl. Seaton Delaval/Holywell, New Hartley, Seaton Sluice/Old Hartley and Seghill.

<sup>&</sup>lt;sup>44</sup> Morpeth neighbourhood area incl. parishes of Morpeth, Hebron, Hepscott, Mitford and Pegswood.

<sup>&</sup>lt;sup>45</sup> Berwick-upon-Tweed and Ord parishes incl. Berwick-upon-Tweed, Tweedmouth and Spittal.

<sup>&</sup>lt;sup>46</sup> North Sunderland parish incl. Seahouses and North Sunderland.

<sup>&</sup>lt;sup>47</sup> Alnwick neighbourhood area incl. parishes of Alnwick and Denwick.

<sup>&</sup>lt;sup>48</sup> Mid-Coquetdale neighbourhood area incl. parishes of Rothbury, Thropton, Cartington and Whitton & Tosson.

- 3.6. In addition to these commitments and neighbourhood plan allocations, the Northumberland Local Plan allocates a further 28 sites for circa 1,025-1,331 net additional dwellings<sup>49</sup>, to help meet the distributed needs in various settlements within parishes not otherwise fully provided for by existing commitments. These new site allocations have superseded any unimplemented housing site allocations in previous 'saved' development plan policies of the county's former districts and boroughs.
- 3.7. The SHLAA assessments consider the likely deliverability or developability of these sites in the context of the updated NPPF definition of 'deliverable' sites, particularly in terms of the various outline planning permissions yet to gain reserved matters consents (which represent only 7.8% of permitted dwellings) and unimplemented development plan allocations. Hence some permitted sites are not projected to deliver any completions within the next five years and so do not contribute to the 5-year supply. Some 'minded to approve' sites may be considered to be 'deliverable' where they are only subject to a S106 agreement being finalised and there is strong evidence to suggest that they have potential to realise at least some completions towards the end of the next five-year period, otherwise they are only regarded to be 'developable' and not forming part of the 5-year supply (see Section 4 methodology for further details).
- 3.8. Several housing allocation sites in 'made' neighbourhood plans and the Local Plan are currently subject to live planning applications, along with various other SHLAA sites, but while the NPPF definition indicates that they could potentially be considered to be 'deliverable' (along with sites in the Brownfield Land Register), for the time being until permission is granted they are not projected to deliver completions within the next five years.
- 3.9. It is also noted that due to the scale of some developments, completions on a few larger strategic sites (e.g. Cramlington South West Sector<sup>50</sup> and Morpeth's former St. George's Hospital site<sup>51</sup>) are projected to continue throughout and beyond the plan period. Anticipated completion rates on these sites are therefore reflected in the housing trajectories, and thus also the extent to which completions on those sites would contribute to the overall SHLAA supply for the plan period.

<sup>&</sup>lt;sup>49</sup> Northumberland Local Plan Delivery Area housing site allocations: South East 344-424 dwellings (9 sites); Central 100-136 dwellings (6 sites); North 295-405 dwellings (6 sites); West 286-366 dwellings (7 sites).

<sup>&</sup>lt;sup>50</sup> Cramlington South West sector currently has extant planning permissions for 1,600 (Bellway/Persimmon, already under construction) and 715 (Barratt/Keepmoat) new homes, while a further permission for 241 (Bellway/Persimmon) homes lapsed in 2018.

<sup>&</sup>lt;sup>51</sup> Morpeth St. George's Hospital site currently has extant permissions for 375 (Linden Homes/Galliford Try, already under construction) and 875 (Homes England) new homes.

# Affordable Housing Commitments

- 3.10. The PPG<sup>52</sup> states that all households whose needs are not met by the market can be considered to be in affordable housing need. As mentioned earlier, 1,365 new affordable homes were completed in Northumberland during the first five years of the plan period 2016-2021<sup>53</sup>, at an average 273 per annum and equating to 17.7% of all housing completions over that period.
- 3.11. The 2018 Strategic Housing Market Assessment (SHMA) Update study identified that Northumberland had a gross need for 374 additional affordable homes per annum over the initial 5-year period 2017-2022 (ie. 1,870 units). When taking into account the supply of outstanding commitments that at that time suggested circa 1,116 affordable units were forecast to be built on permitted housing sites over that 5-year period, the SHMA Update then calculated there to be a residual net need for about a further 754 affordable dwellings to be permitted and built in the county over that 5-year period at an annual net imbalance of an average 151 units per annum (which equates to 17% of the new Local Plan's overall annual average housing requirement).
- 3.12. Updated analysis shows that there were 1,738 affordable homes outstanding to be built on permitted development sites as at 31 March 2021 (including 14 affordable homes on small sites of less than 5 dwellings capacity). Another 4 affordable homes form part of 'minded to approve' application sites subject just to finalisation of a S106 agreement, giving a current overall total outstanding committed supply of 1,742 affordable units<sup>54</sup>. The remaining as-yet-unpermitted development plan housing site allocations provide scope for further affordable housing provision, together with any potential 'windfall' and exception sites.

<sup>&</sup>lt;sup>52</sup> PPG re. <u>Housing and Economic Needs Assessment</u> (December 2020, paragraph 018).

<sup>&</sup>lt;sup>53</sup> Affordable housing completions 2016-2021: South East 574, Central 525, North 231, West 35.

<sup>&</sup>lt;sup>54</sup> Affordable housing outstanding permitted (committed) supply: South East 921, Central 477 (+4), North 322, West 18.

# 4. Site Assessment Methodology

4.1. The identification and assessment of potential land for housing development across Northumberland is consistent with the broad methodology identified in the Government's national Planning Practice Guidance (PPG) on <u>Housing and</u> <u>Economic Land Availability Assessment</u>. It has also been informed by the earlier North East England SHLAA Regional Implementation Guide (March 2008)<sup>55</sup>, which gave some locally-specific context to national guidance while also helping to ensure a broadly consistent approach and common database framework across the North East region. The use of this standard methodological approach helps to ensure that the findings of the assessment are robust, with the study being prepared in a transparent manner each time the SHLAA is reviewed.

### Stage 1: Identification of Sites and Broad Locations

- 4.2. The SHLAA covers the Northumberland County Council local planning authority area, excluding Northumberland National Park which is a separate planning authority<sup>56</sup>. It identifies sites from as wide a range of sources as possible throughout the County Council's administrative area, taking into consideration the potential sources of sites set out in both the PPG and the Regional Implementation Guide.
- The PPG advises that all **specific sites** capable of delivering five-or-more dwellings 4.3. should be considered (although an alternative site size threshold may be considered more appropriate). Given the large scale and rural nature of much of Northumberland and the significant number of small-scale development sites, coupled with limited resources, undertaking a full assessment of all smaller sites of less than five dwellings capacity is considered to be impractical. Small sites nevertheless make an important contribution to the county's housing land supply, so in accordance with best practice advice in the PPG, the SHLAA methodology therefore adopts a 'windfall' allowance approach to provide an indication of the levels of net additional housing likely to be delivered on small sites of less than five dwellings capacity<sup>57</sup> (or less than circa 0.2ha in size) – see Stage 3. This 'small sites windfall allowance' is based on analysis of the number of dwellings completed on such small sites in previous years, with that number then projected forward over the monitoring period, as also reflected in the housing trajectory. This is considered to be the most pragmatic and transparent approach.

<sup>&</sup>lt;sup>55</sup> North East England SHLAA Regional Implementation Guide (March 2008) was developed through a partnership approach coordinated by the former North East Assembly (NEA), and involving stakeholders from across the public, private and voluntary sectors, including the Homebuilders Federation (HBF).

<sup>&</sup>lt;sup>56</sup> The first Northumberland SHLAA included a small number of sites within Northumberland National Park, but given the latter's minimal contribution to meeting the county's overall housing land supply and that the vast majority of sites are small-scale, subsequent SHLAAs have focused purely on Northumberland County Council's administrative area. The two authorities nevertheless continue to work in partnership in relation to housing supply and provision.

<sup>&</sup>lt;sup>57</sup> The previous records for small sites (of less than 0.2ha or with the potential to deliver fewer than five dwellings) that were included in earlier SHLAAs have been retained, although they are no longer considered on an individual basis for the purposes of the housing land supply analysis to avoid double-counting.

4.4. Given that the scale of commitments, combined with the housing site allocations in neighbourhood plans and the Northumberland Local Plan, would satisfactorily meet the county's objectively-assessed housing needs (which are higher than the Local Housing Need-based requirements for the SHLAA and 5-year housing land supply), it is not considered necessary to identify any **broad locations** for development over-and-above the supply of specific suitable sites at the present time. However, a review of broad locations may be required in the future if there becomes a need to identify further land to meet longer-term housing needs.

### **Call for Sites**

4.5. Northumberland County Council's most recent formal 'call for sites' consultation took place in early 2018 to informing the preparation of the Northumberland Local Plan, while several other sites have been put forward for consideration outside of this formal process, including through public consultations on the Local Plan.

### Initial Desktop Study and Site Surveys

- 4.6. An initial desktop survey was undertaken to determine each submitted site's location in the context of a range of national policies and environmental designations and physical assets that may impact on or otherwise influence the extent to which sites might have a reasonable potential for residential development. Appendix A sets out the significant 'Category 1' constraint designations and other 'Category 2' constraints that will impact on a site's potential suitability and achievability.
- 4.7. The presence of a 'Category 1' designation would generally deem a site to have no housing potential by virtue of the site not therefore being suitable for development. Any sites that lie wholly or predominantly within any of these 'Category 1' designations are therefore 'sieved out' of the process and not subjected to a full survey (although they are still logged in the SHLAA database for clarity and completeness). However, if only a small proportion of a site lies within a 'Category 1' designation, then the remainder of the site has been assessed with an appropriate reduction in the net developable area of the site.
- 4.8. 'Category 2' constraints are generally less restrictive in terms of the potential suitability and achievability of a site for residential development, but may affect the scale and type of development that could potentially take place. However, this would not be reason to discount such sites from the assessment at this initial stage, with the details gathered informing Stage 2 of the assessment.
- 4.9. **Green Belt land** is regarded as a Category 2 constraint designation as it does not automatically prohibit development, although as a strong national policy it represents a high degree of constraint to potential housing delivery. In accordance with the NPPF, the construction of dwellings in the Green Belt (particularly on previously-undeveloped 'greenfield' sites) is regarded as inappropriate development. The NPPF does, however, suggest that the redevelopment of previously-developed 'brownfield' sites and some limited infilling in villages may be regarded as potentially acceptable exceptions where (predominantly affordable

housing) development would not have a greater impact on the intrinsic openness and purposes of the Green Belt. The SHLAA analysis therefore takes these potential exceptions into account where such sites may be consistent with the Northumberland Local Plan's spatial strategy. Any planning application seeking residential development within the designated Green Belt that does not meet any of the exceptions for not being regarded as inappropriate development would have to justify 'very special circumstances' for doing so, while development plans can only release land from the Green Belt as part of a formal local plan review where 'exceptional circumstances' for doing so have been soundly evidenced and justified.

- 4.10. Informed by updated evidence of housing needs (which is a material consideration in decision-making), the Northumberland Local Plan identified no need to release any land from the designated Green Belt in order to help meet the county's objectively-assessed housing needs and requirements over the next 15-20 years. Therefore, unless a site already benefits from an extant planning consent permitting housing development (or a planning application that has been 'minded to approve'), the SHLAA regards all sites within the Green Belt (as delineated on the Local Plan's Policies Map) to be generally inappropriate and thus 'not suitable' for future housing development within the timeframe of this SHLAA.
- 4.11. As such, these Green Belt sites and broad locations are effectively 'sieved out' from the SHLAA at the outset (regardless of their potential availability or theoretical achievability), since they cannot be regarded to be potentially 'deliverable' or 'developable' as part of the county's housing land supply. However, the SHLAA and 5-year supply process does provide for such Category 2 sites and broad areas to be returned to at a later stage for possible reconsideration if insufficient sites to satisfy the minimum housing land supply requirements are identified through the initial assessment.
- 4.12. Additionally, national and local planning policy seeks to prioritise development within and adjacent to existing settlements, such that isolated dwellings in the countryside and other land that is disconnected from a settlement is unlikely to be granted planning consent given its locational unsuitability for residential development<sup>58</sup>.
- 4.13. The planning background of sites is also taken into account, while the initial desktop study has generally been supplemented by a site visit (unless the site already benefits from an extant planning permission for housing). This helps to gain a better appreciation of the sites and ratify information gathered through the call-forsites and the desktop assessment, as well as gaining a better understanding of what type and scale of development may be appropriate, and a more detailed understanding of any barriers to development and delivery and how they may be overcome.

<sup>&</sup>lt;sup>58</sup> The SHLAA's 'sieving out' of sites does not preclude a planning application being submitted for housing development, in which case the appropriateness and suitability of the proposal will be considered on an individual basis through the Development Management process.

### Stage 2: Sites Assessment

- 4.14. A series of guiding methodological principles and assumptions for assessing SHLAA sites have been established help ensure a consistent approach, informed by the national and regional guidance, best practice and the local context.
- 4.15. The PPG requires that sites are located in a suitable location for residential development, and are likely to be available and viable for delivering development in the context of the current housing market at some point over the plan period (at least the next 15 years). Sites are therefore assessed in terms of their suitability, availability and achievability (including economic viability) in order to determine whether they may be potentially 'deliverable', 'developable' or 'not currently developable' for housing, based on the evidence available at the time of the assessment.
- 4.16. The <u>NPPF</u> (July 2021) sets out the definition of 'deliverable' and 'developable' sites in the Glossary as follows:
  - **Deliverable:** 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<sup>59</sup>, 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.

- **Developable:** To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.
- 4.17. The Secretary of State furthermore confirmed in June 2020<sup>60</sup> that the NPPF's definition of 'deliverable' sites is not a 'closed list', and that the examples given above are not exhaustive of all the types of site that are capable of meeting the definition of 'deliverable'. This clarifies that in calculating the 5-year housing land supply, local planning authorities may also consider sites that do not fall within categories (a) or (b) in the above definition (e.g. those with a resolution to grant

<sup>&</sup>lt;sup>59</sup> Major development for housing is defined in the NPPF Glossary as being "development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more". For development management purposes, the definition in the General Development Procedure Order (GDPO, 2015) additionally advises that the 0.5ha threshold only applies in circumstances where it is unknown whether or not the number of dwellings on the site will be 10 or more.

<sup>&</sup>lt;sup>60</sup> Subsequent to the May 2020 High Court judgement for <u>East Northamptonshire Council v Secretary of</u> <u>State for Housing, Communities and Local Government. Case Number: CO/917/2020.</u>

planning permission subject to the finalisation of a Section 106 agreement, or draft allocations in an emerging development plan document) to be 'deliverable' if the evidence shows that, as a matter of planning judgment, they are likely to be so. The 'deliverable in principle' sites in category (a) do not therefore require evidence to show that they are 'deliverable' (although evidence may suggest that they are not), while sites in category (b) and others will require clear evidence to justify that they are 'deliverable' in order for them to contribute to the 5-year supply.

4.18. Thus for a site to be concluded to be **'not currently developable'**, either it is deemed unsuitable due to the significance and severity of impact on the environmental designations and constraints apparent such that they would prohibit any positive assessment (even in the longer term), or is otherwise not considered that there is a reasonable prospect of the site being likely to come forward for viably achievable development within the plan period or at least within the next 15 years. Such sites have therefore been discounted, with no housing numbers delivery forecast through the housing trajectory.

### **Assessing Suitability**

- 4.19. Sites are likely to be considered 'suitable' where they offer a suitable location for housing development having assessed any physical limitations and the potential impacts of development (including having taken account of any 'Category 1' and 'Category 2' constraints), and that a residential scheme would contribute to the creation of sustainable mixed communities.
- 4.20. PPG advises that the suitability of sites, or any broad locations for development, should be guided by:
  - the development plan, emerging plan policy and national policy; and
  - market requirements in that housing market area<sup>61</sup>.
- 4.21. The Northumberland Local Plan and 'made' neighbourhood plans provide a consistent and up-to-date strategic county-wide development plan policy approach, together with detailed site allocations. While the SHLAA is largely policy neutral, in light of the Planning Inspector's recommendations during the independent examination of the Local Plan, all as yet unpermitted SHLAA sites have been reviewed in terms of their likely **compliance with development plan policies**, particularly in relation to settlement and Green Belt boundaries, Local Green Space and protected open space designations, as well as in terms of the more detailed Heritage Impact Assessments carried out of the Local Plan's site allocations<sup>62</sup>. Hence, for the purposes of this SHLAA, only those sites that would be likely to be considered to be Local Plan compliant for possible future housing development are now assessed to be potentially 'suitable' for delivery within the plan period.
- 4.22. In terms of the potential suitability of **disused and vacant employment land** for possible residential uses, an assumption has been made that only those employment site allocations that are set out in the Northumberland Local Plan,

<sup>&</sup>lt;sup>61</sup> The Council considers that market attractiveness is best appraised through the assessment of Achievability instead of as part of the Suitability element.

<sup>&</sup>lt;sup>62</sup> Northumberland Local Plan: Heritage Impact Assessments (October 2019, as amended).

along with any further employment allocations in 'made' and post-submission draft neighbourhood plans, should be regarded as 'not suitable' for housing development. This is because these sites are considered to be necessary to support economic growth objectives.

4.23. The PPG further advises on a range of other factors that should be considered in the assessment of a site's suitability for possible housing development

### **Assessing Availability**

- 4.24. A site is considered to be 'available' for development now when, based on the best information available, there is confidence that there are no legal or ownership problems to be overcome that might hinder or prevent implementation and delivery of housing development (e.g. unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners). If issues are identified, then the likely ability to realistically overcome the obstacles in the immediate future has been considered.
- 4.25. The assessment of a site's availability has been informed by the information provided through the submission of the site for consideration in the SHLAA, as well as further details provided by landowners and developers who have an interest in the site, such as through targeted consultations with developers and landowners. This ensures that the assessment continues to reflect the latest situation and context and that the subsequent conclusions are as robust and up-to-date as possible.
- 4.26. Land owned by Northumberland County Council that does not benefit from a formal resolution to dispose cannot be regarded as being 'available' at the present time, and as such has effectively been 'sieved out' from the potential 'available' and thus 'deliverable' supply. However, this does not preclude their potential for development in the medium to longer-term, and thus they could still contribute to the 'developable' supply of potential housing land and have been assessed accordingly taking into consideration that they may become available in the future.

### **Assessing Achievability**

- 4.27. In accordance with the PPG, a site is considered to be 'achievable' for development if there is reasonable prospect that housing will be developed on the site at a particular point in time. The assessment of achievability is essentially a judgement about whether a site would be likely to be economically viable to deliver, together with consideration as to whether there is a market for residential development in that particular location (i.e. that new housing can be viably sold or rented) and whether the developer is likely to have capacity to complete and sell the housing over a certain period.
- 4.28. The assessment of achievability is affected by:
  - Market factors such as adjacent uses, economic viability of the existing, proposed and alternative uses in terms of their respective land values, the attractiveness of the locality, and the level of potential market demand; and

- **Cost factors** including site preparation costs relating to overcoming any physical constraints, any exceptional works necessary, relevant planning standards or likely planning obligations, and the prospects of gaining the necessary funding or investment to address constraints or assist development.
- 4.29. The Council has made a proportionate informed judgement of the likely viability of delivery on the basis of the information available for each site, while also giving reference to the Local Plan's housing viability value areas<sup>63</sup>.
- 4.30. In accordance with the PPG, and along with considering the planning background of sites, the delivery record of relevant developers and landowners is also considered to identify if there is any history of unimplemented permissions<sup>64</sup>. Additionally, the likely capacity of a prospective developer to complete or sell homes over a certain period has also been taken into consideration.
- The individual site assessments have also considered the likelihood of extant 4.31. planning permissions not being implemented, with the forecasted delivery on each site having been directly informed by landowners/developers/applicants/agents themselves wherever possible and taking into account the Council's delivery assumptions. As such, through the informed discounting of some sites from being likely to deliver any or further completions, a reasonable lapse rate allowance is effectively built into the SHLAA and 5-year housing land supply. Analysis of delivery rates and the likelihood of permissions lapsing before implementation nevertheless suggest that there is a reasonably high degree of confidence that the majority of permitted housing applications in Northumberland will come forward and be delivered. Evidence from the past 5-10 years consistently suggests that, on average, only around 7-8% of permitted applications in Northumberland each year have lapsed before implementation (about 4-5% of large and medium-sized sites applications and 9% of small sites applications). However, fundamentally, these lapsed permissions have actually only involved, on average, about 3% of permitted dwelling units lapsing (2-3% of dwellings on large and medium-sized sites and 9-11% of dwellings on small sites)<sup>65</sup>.

### **Considering the Scope for Overcoming Constraints**

4.32. Where the combination of constraints identified is considered to impact on the potential suitability, availability, achievability and thus delivery of a site, further consideration has been given as to what action might be needed to overcome and alleviate these issues. Subject to the nature of the constraint, further discussions and advice were sought as appropriate in coming to a judgement, such as from infrastructure and utilities providers. This could be in terms of the need for new infrastructure investment, dealing with fragmented land ownerships, requirements for environmental improvements, or the potential future need and likelihood for reviewing planning policies that would otherwise restrict development.

<sup>&</sup>lt;sup>63</sup> The viability value areas are based on Lower Super Output Areas (LSOA) rather than just focusing on specific main settlements, and are illustrated on the Local Plan's Policies Map.

<sup>&</sup>lt;sup>64</sup> The Council considers that the non-delivery of sites is, however, more a consequence of the wider economic climate, along with local factors that may affect the viability of development at the present time.

<sup>&</sup>lt;sup>65</sup> Research by <u>Lichfields</u> similarly found that only 3-5% of homes on permitted sites typically lapse or stall.

### **Determining the Achievable Timescales for Development**

- 4.33. For those sites assessed to be 'suitable' and 'achievable', to then be regarded as potentially '**deliverable'** it must be concluded that the site is 'available' now and there is reasonable prospect that housing completions will be delivered on the site within the next five years, in line with the NPPF definition.
- 4.34. The NPPF states that all sites with detailed planning permission (i.e. all full permissions and those outline permissions that have gained reserved matters approval) should be considered to be 'deliverable in principle' until such time as the permission expires/lapses, unless there is clear evidence that schemes will not be implemented within the next five years. Non-'major' sites (i.e. less than 10 dwellings or 0.5ha) with outline permission yet to gain reserved matters approval should also be treated as being 'deliverable in principle' in the same way. Further evidence is, however, required to justify the potential deliverability of 'major' sites only with outline permission, as well as for those with Permission in Principle and other as yet unconsented sites allocated for housing in the development plan, included in the Brownfield Land Register or other potentially Local Plan-compliant sites.
- 4.35. Sites for which there is only a reasonable prospect of housing being developed in the medium to longer terms (i.e. 6-10 years or 11-15 years) can then only be regarded as being potentially '**developable**'.
- 4.36. In assessing whether there is a reasonable prospect of delivery within these respective timeframes, consideration is given to the current planning status of the site and evidence gained from developers of their delivery intentions, anticipated start on site and build-out rates, as well as any grant funding arrangements.
- 4.37. Any potentially 'suitable' sites that would not be likely to achieve any housing completions within the next 15 years are regarded as being 'not currently developable' for the purposes of the SHLAA. However, together with the delivery of any housing completions on 'deliverable' and 'developable' sites that are indicatively 'phased' in the housing trajectory for delivery beyond the plan period, while not contributing to the SHLAA's housing land supply they may still have potential to contribute towards providing for the county's longer-term housing requirements beyond 2036.
- 4.38. For large and medium-sized sites (of more than 5+ dwellings indicative capacity) already with full or outline planning consent, the Council has sought to consult directly with the landowners/developers/applicants/agents and other interested parties in order to obtain the most up-to-date anticipated delivery rates and other relevant information about a site. The latest targeted consultation exercise of permitted sites took place between 23 June 23 July 2021, with follow-up correspondence and liaison carried out where necessary. An additional targeted consultation for all 'major' sites with outline permission and as yet unpermitted SHLAA sites that might be regarded to be potentially Local Plan-compliant took place between 24 January 10 February 2020 in order to help inform the Local Plan examination actions.

- 4.39. Unless the Council had good reason not to do so, the information received from development industry consultees regarding anticipated yield/capacity, realistic delivery forecasts and marketability has been accepted as reliable and conclusive and so is reflected in the site assessment and housing trajectory. If sense-checking of the anticipated delivery rates suggested a slight adjustment to be appropriate (e.g. spreading delivery over a longer period), or there was a need to question or challenge the evidence provided, based on local knowledge and understanding, then this has been done.
- 4.40. In circumstances where no recent delivery information has been obtainable or a site is not yet permitted, the assessment of likely delivery timescales has been informed by a number of common methodological delivery assumptions, as set out in Appendix B. These assumptions reflect the NPPF definition of 'deliverable' and whether a site is subject to a full or outline planning permission/application<sup>66</sup>, while also being based on best practice, knowledge of local context and circumstances, historic trends and officer experience of typical build-out rates for the prevailing market conditions in that location, alongside taking into account the planning status of sites and the nature, scale and type of scheme proposed. Together, this evidence has enabled reasonably realistic and robust year-by-year delivery to be forecast within both the initial 5-year period and beyond. The monitoring process will enable the delivery assumptions to be checked over subsequent years against actual delivery rates, and updated and refined as appropriate.
- 4.41. The PPG nevertheless confirms that having a planning permission in place is not a prerequisite for a site to be considered 'deliverable' within the next five years. Importantly, only those sites that satisfy the NPPF and PPG criteria for being 'deliverable' have been forecast to deliver dwelling completions within the next 5 years. For outline applications only recently consented (e.g. within the six months prior to the 31 March 2021 baseline date), it is not considered appropriate to exclude their potential to at least contribute in part to the 5-year supply given that they have not yet had reasonable opportunity within which to submit and gain reserved matters approval since the outline permission was granted.
- 4.42. The Council's general assumption for the SHLAA is that large and medium-sized sites without planning consent will not deliver housing completions within the next five years, being most likely 'developable' in the medium to longer term, unless there is sufficient evidence to robustly suggest otherwise. Such unpermitted sites that may have potential to deliver housing completions within the initial 5-year period of the trajectory, and thus be considered 'deliverable', include:

<sup>&</sup>lt;sup>66</sup> Sites with full planning permission generally have 3 years from the decision date (unless an extended timescale has been granted) to make a start on site and thus implement the planning consent before they lapse. Sites with outline permission generally have 3 years from the decision date by which an initial reserved matters approval is required to have been submitted before the outline consent would lapse, and then a further 2 years from the reserved matters approval decision date to have made a start on site before that detailed consent would lapse. However, the Business and Planning Act 2020 (22 July 2020) confirmed that in order to address the impacts of the Covid-19 coronavirus pandemic on the development sector and help enable the economic recovery, all planning consents (including reserved matters) that were due to expire between the start of the first lockdown on 23 March and 31 December 2020 would be extended until 1 May 2021 (subject to Additional Environmental Approval being granted for full and outline permissions that expired between 23 March 2020 and the measures coming into force on 19 August 2020).

- sites with a full or reserved matters planning application consented soon after the 31 March 2021 base date of the SHLAA; and
- sites with a full or reserved matters planning application 'minded to approve' (i.e. a resolution to grant permission subject only to the signing of a S106 or highways legal agreement) and which have been assessed to be 'suitable', 'available' and 'achievable' in the SHLAA, with on-site development expected to progress reasonably quickly.
- 4.43. The delivery from large and medium-sized 'developable' sites currently without planning consent has otherwise been assumed to commence within the 6-10 years period, unless evidence indicates there are particularly complex-to-overcome constraints identified or where a site would appear to represent a later phase of an adjacent potential development site, in which case the assumption has been made that delivery of completions will only start to come forward within the 11-15 year timeframe and/or beyond.
- 4.44. For small sites (of less than five dwellings capacity or circa 0.2ha in size), given their sheer volume across Northumberland's extensive county area, resource implications dictate that it is impractical and unrealistic to be able to include these as specific sites within the SHLAA and obtain individual site delivery forecasts from landowners and developers. It is nevertheless recognised that small sites will continue to make an important contribution towards the overall delivery of new housing in Northumberland and thus to the county's future housing land supply. A 'small sites windfall allowance' has therefore been developed to account for this element of the county's housing land supply in forecasting the scale of potential future delivery, based on past trends of the average annual housing completions rate on small development sites. This is explained further in Stage 3 of the assessment, with this component of the supply reflected accordingly in the housing trajectories.

### **Estimating the Potential Housing Capacity of Each Site**

- 4.45. In cases where a site has planning permission or is 'minded to approve', then the dwellings figure from the planning application has been applied.
- 4.46. As a starting point to calculate the indicative scale of housing that could potentially be accommodated on other sites, the likely net developable area of the site is first identified. This reflects the fact that on larger sites the whole of the site is unlikely to be utilised for residential development as more of the gross site area is necessarily given over to associated infrastructure such as access roads and public open spaces (including landscaping and Sustainable Drainage Systems (SuDS)), as well as non-residential community facilities (including local neighbourhood shops) on the largest sites. Thus, as a general rule, the larger the site the greater the proportion of reduction in the net developable area.
- 4.47. The North East SHLAAs Regional Implementation Guide provided guidelines for the appropriate gross to net ratios to be applied, as set out in Figure 5 below. More detailed site-specific analysis, taking into consideration local environmental

characteristics related to the site's location, has also informed the percentage and hectarage of net developable area applied. Where site-specific circumstances indicate that a lower net developable area would be more appropriate than that assumed by the methodology (e.g. due to topographical constraints, a high proportion of the site within flood risk zones, or access limitations), then that lower figure has been applied.

Gross Site Area	Net Developable Site Area Percentage
< 0.4 ha	100%
0.4 - 2.0 ha	75-90% (average 82.5%)
> 2.0 ha	50-75% (average 62.5%)

Figure 5: Indicat	tive Gross to Net I	Developable Site Area Ra	tios
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- 4.48. For those sites assessed to be potentially 'deliverable' and 'developable', indicative housing densities have then been applied to the net developable area to calculate the potential indicative dwellings capacity or yield of each site.
- 4.49. The NPPF no longer provides any specific density guideline, instead promoting making effective and efficient use of land, and particularly optimising the use of land and avoiding low densities where there is an anticipated shortage of land to meet identified housing needs. Supporting PPG advises that the estimate of a site's development potential should be informed by existing and emerging development plan policy. Consistent with the NPPF, the Northumberland Local Plan seeks to make efficient use of land in character with its location and surroundings, including higher residential densities in more accessible locations where appropriate.
- 4.50. For the purposes of the SHLAA, the previous national guideline minimum 30 dwellings per hectare density has generally been applied as the starting point for calculating the indicative number of units a site could potentially accommodate. However, previous local analysis of individual site specific densities – taking into consideration the local setting, character and scale of existing developments, as well as any physical and/or environmental constraints that could limit the potential developable area, together with highways accessibility and capacity – suggests that lower densities are more appropriate to apply for sites located in the more rural parts of the county, with higher densities being more appropriate within the urban areas of existing main towns (e.g. urban 'brownfield' redevelopment sites), particularly in the South East Northumberland area where delivery is more influenced by economic viability pressures in the local market and proximity to the Tyneside conurbation. These informed development density assumptions are set out in Figure 6 below. They are further backed up by monitoring of the densities of completed 'major' sites over the past five years, which suggests that the average density of 'major' new housing developments in Northumberland has been around 22 dwellings/ha, but with this varying from around 31 dwellings/ha in the more urbanised South East Delivery Area of the county to around 10-12 dwellings/ha in

the more rural West and North Delivery Areas, with the Central Delivery Area being in line with the countywide average density.

Figure 6: Indicative Dwellings Capacity Site Density Assumptions
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Location	Density (dwellings per hectare)
General	30 dwellings / ha
Urban infill and redevelopment sites	30-40 dwellings / ha
Rural towns and villages	15-20 dwellings / ha
Outside settlements and in isolated locations	5-10 dwellings / ha

4.51. While this approach provides a basis for determining appropriate indicative site capacities, the estimated yield of a site may be refined at the site assessment stage taking into consideration information received from stakeholders and provided through consultation processes – e.g. a landowner or developer may have already undertaken preliminary work looking at the layout and density for an appropriate scheme, in which case this will be reviewed by officers to inform the site assessment process and help ensure that the indicative capacity is realistic and appropriate. This also applies where a live planning application has been submitted.

### **Considering Cumulative Development Capacity**

- 4.52. Furthermore, while assessing each site on an individual basis, it is important to also understand the cumulative scale of development that is could potentially be delivered across a particular area, such that the site assessments also need to be considered collectively in compiling the housing trajectory.
- 4.53. While a site may be concluded to be potentially 'deliverable' or 'developable' on an individual basis within a specific timeframe, the overall cumulative level of development that can be delivered and marketed in a particular location at any one time may be constrained i.e. the capacity of the housebuilding industry to build new homes and the market demand for selling/renting the completed units may restrict the overall scale of possible completions across a number of nearby sites.
- 4.54. The Council has previously sought advice from the development industry with regards to the level of development that is likely to be realistically capable of being delivered across different geographical areas of Northumberland, as well as the appetite for development and of the housebuilding industry in specific locations in the county. Housebuilders considered that latent demand and continuing improvement in the overall housing market would facilitate the delivery of multiple sites by multiple developers in the Main Towns and Services Centres of Northumberland, particularly in Morpeth and Cramlington where existing consents would provide for a mix of housing types and tenures and so provide the necessary choice across the market. This information has enabled the Council to make informed judgements on the realistic overall capacity of sites to deliver housing

across Northumberland, particularly within the more rural parts of the county (e.g. by considering more closely the impacts of potential development on smaller settlements), while also taking relevant existing and emerging planning policy into consideration.

4.55. While it is not the role of the SHLAA to select and determine which might be the most appropriate 'deliverable' and 'developable' sites to come forward, or to give any kind of ranking in terms of preference or order of delivery, it is considered that taking this overview approach to potential delivery allows for a more realistic assessment to be made of the theoretical capacity for development. This reassessment of potential site yields also helps to make the housing trajectory more realistic and robust.

### **Public Consultation on Draft Site Assessments**

- 4.56. The draft SHLAA site assessments were made available for consideration alongside the Regulation 18 draft Northumberland Local Plan in Summer 2018, with further feedback on the potential deliverability of sites received as part of consultation on the Regulation 19 publication draft Local Plan in early 2019 and through the Local Plan's examination process (including via the additional targeted developer consultation of both 'deliverable' and Local Plan-compliant 'developable' sites carried out for the Local Plan examination in early 2020. These engagement processes provided stakeholders and other interested parties from local communities with an opportunity to consider the assessments of sites they may have submitted or otherwise be interested in and to provide any further information. Any supplementary evidence or comments received through these exercises were then considered by officers, allowing scope for any amendments where necessary.
- 4.57. Public engagement is nevertheless recognised to be an ongoing iterative process. Accordingly, the Council therefore welcomes submissions of more up-to-date information about existing sites throughout the year, with information received feeding into the next SHLAA review.

### Stage 3: Windfall Assessment

- 4.58. An effective strategy for providing new homes should take account of the potential for delivery arising from sites that are yet to be identified through the planning process. 'Windfall' sites are defined in the NPPF as those unanticipated, unplanned "*sites not specifically identified in the development plan*" or identified for potential alternative development in the SHLAA or plan-making processes, generally coming forward through planning applications. Such sites will continue to come forward in the future, typically comprising previously-developed 'brownfield' sites that have unexpectedly become available as a result of the closure of an existing business or community facility on all or part of a site.
- 4.59. By definition, sites identified in the SHLAA are known and thus cannot be considered as 'windfall' sites.

- 4.60. The NPPF (paragraph 69) and PPG indicates that local planning authorities may make an allowance for 'windfall' sites in the SHLAA and anticipated 5-year supply when there is compelling evidence that such sites have consistently become available in the local area and will likely continue to provide a reliable source of supply. Any forecast of delivery from 'windfall' sites therefore needs to be evidentially justified and realistic, having regard to the SHLAA, historic 'windfall' delivery rates and expected future trends, with that figure then projected forward as an allowance.
- 4.61. The potential for future 'windfall' housing development across Northumberland has therefore been considered. Following analysis of specific local circumstances, it is considered that the Northumberland SHLAA is comprehensive in the way it identifies and assesses large and medium-sized sites, capturing sources of delivery at the earliest possible stage, such that the Council does not consider there to be compelling evidence to justify the inclusion of an allowance in the trajectory for 'windfall' delivery from large and medium-sized sites of five dwellings or more. However, applying a 'windfall' allowance is considered to be a proportionate approach for capturing the potential supply arising from small sites of less than five dwellings capacity.

### **Small Sites Windfall Allowance**

- 4.62. As previously noted, due to the significant number of small housing development sites being delivered in Northumberland, reflective of the county's vast overall scale and largely rural environment, the identification and assessment of potential sites of fewer than five dwellings capacity requires a substantive level of resource. Consequently it is not considered to be practical to record these sites individually as part of the SHLAA process, such that a minimum site capacity threshold of five dwellings-or-more (or circa 0.2ha gross site area) has reasonably been adopted in assessing the housing land supply position from individual sites.
- 4.63. Small sites have nevertheless consistently contributed towards housing delivery in all areas of the county, predominantly through small-scale changes of use and conversions, as well as any empty homes brought back into use that are not recognised as being part of the current housing stock. Hence, regardless of the NPPF definition providing for non-'major' sites to be considered as being 'deliverable in principle', in lieu of recording no site-specific delivery figures for those identifiable small sites that currently benefit from planning permissions<sup>67</sup>, the SHLAA's use of a 'small sites windfall allowance' is considered to be fully justified for the purposes of outlining potential future housing delivery in the SHLAA that might arise from smaller sites of less than five dwellings indicative capacity (circa 0.2ha site area or less).
- 4.64. Analysis of historic monitoring data shows no clear trends associated with the delivery of small sites, either in terms of the implementation of planning consents or

<sup>&</sup>lt;sup>67</sup> Any small sites already with planning permission that are included in the SHLAA are effectively 'sieved out' for the purposes of calculating the housing land supply to avoid double-counting when applying the 'small sites windfall allowance' approach. As at 31 March 2021, there were 901 dwellings outstanding to be built on permitted small sites of less than 5 dwelling capacity.

for annual rates of delivery once under construction. Housing completions in the county over recent years have therefore been used as a basis for forecasting potential future delivery from small sites, giving confidence to the robustness and reliability of the county's housing delivery figures (see Appendix C).

- 4.65. The latest analysis reveals that some 11% (1,298) of the total 11,906 net additional dwelling completions in Northumberland over the past 10 years 2011-21 were on sites of less than five units. This points to an indicative annual average delivery rate on small sites of about 130 dwellings per annum.
- 4.66. If just taking the past five years 2016-2021 since the start of the Local Plan's plan period, then that would suggest a small sites delivery rate of around 107 dwellings per annum (averaging a fairly consistent circa 7% of net completions).
- 4.67. Taking a simple conservative approach, an **indicative future annual average small sites delivery rate of 100 dwellings per annum** has therefore been assumed for the purposes of this SHLAA.
- 4.68. Based on the distribution of the outstanding supply of unimplemented permissions on small sites, indicative distribution of this forecast small sites completion rate across the four Local Plan Delivery Areas could be anticipated as follows:
  - South East 13.9% 14 dpa
    Central 38.8% 39 dpa
    North 36.3% 36 dpa
    West 11.0% 11 dpa
- 4.69. As with other aspects of housing supply, actual delivery and the small sites contribution rate will be kept under review through the monitoring process to ensure that future forecasts continue to be realistic and indicative of local circumstances and market factors. This, in turn, will feed in to future iterations of the SHLAA and 5-year housing land supply analysis.

# Stage 4: Assessment Review

- 4.70. Once the site assessments have been completed, in accordance with the PPG the development potential of all sites is collated using the evidence gained to produce an indicative housing trajectory illustrating how much new housing could be provided and the forecast year-by-year timescales for their delivery.
- 4.71. If an overall shortfall against the objectively-assessed monitoring requirement for housing in the county is identified within the final projections, then assumptions on the development potential of sites are revisited, including further consultation with relevant parties if appropriate.
- 4.72. If, following this step, there is still projected to be a shortfall in supply against the minimum housing requirements, then additional sites and broad areas need to be sought and assessed accordingly using the SHLAA methodology. This could potentially include a Green Belt review if necessary.

4.73. If the county's needs ultimately cannot be met within Northumberland, then the Council has to consider how the shortfall might potentially be met in neighbouring local authority areas, in accordance with the Duty to Co-operate.

# Stage 5: Final Evidence Base

4.74. The SHLAA report summarises the key information and findings resulting from the site assessment and review process. A consistent set of outputs is produced to ensure consistency and transparency, as set out in Figure 7 below.

### Figure 7: SHLAA Core Outputs

	Outputs from the SHLAA
1	<ul> <li>A schedule of all sites and broad locations, cross-referenced to their locations on maps, including:</li> <li>'deliverable' sites - contributing to the supply in the first 5 years;</li> <li>'developable' sites - forecasting delivery from year 6 onwards (as either 'years 6-10', 'years 11-15' or in the longer term 'years 15+';</li> <li>sites currently considered to be 'not presently developable' and unable to contribute to any forecast of future delivery (including sites 'sieved out' in the early stages of the assessment: category 1 sites, greenfield sites in the countryside, and Northumberland Council Council-owned sites without a resolution to dispose).</li> </ul>
2	An assessment of each site or broad location in terms of its suitability for development, availability and achievability (including whether it is viable) to determine whether a site is realistically expected to be developed and when.
3	Further detail for those sites that are considered to be realistic candidates for possible housing development (i.e. not 'sieved out'), some of which may be 'deliverable', some 'developable' and others 'not currently developable'. Where other sites have been discounted the reasons will be evidenced and justified.
4	The potential quantity of housing development that could potentially be delivered on each site, including a reasonable estimate of build-out rates, setting out how any potential barriers to delivery could be overcome and when.
5	An area-based analysis to identify the capacity of different geographical areas of Northumberland to accommodate housing development within different time periods.
6	An indicative trajectory of anticipated housing development, indicating the years in which dwellings might be expected to be delivered on each site, for the first 5-year period and during each 5-year band thereafter, with consideration of associated risks that may inhibit delivery.

- 4.75. In addition to the county-wide summary housing trajectory, indicative trajectories are also prepared for each of the county's Local Plan Delivery Areas.
- 4.76. Housing delivery will be monitored using the indicators identified in the Local Plan's integral Monitoring & Implementation Framework. This information will be published and made available at appropriate times as part of the ongoing monitoring process.

### **Consultations Feedback Summary**

- 4.77. The most recent formal 'call for sites' that took place between in early 2018 saw over 500 residential site submissions, including some sites that were wholly or partially within Category 1 significant constraints areas and over 200 sites in the designated Green Belt. Many sites were already in the SHLAA, although some proposed slightly amended boundaries, while several simply sought to promote already permitted sites or development plan allocations with others seeking to promote sites subject to live planning applications or pre-application enquiries. Some sites had previous lapsed permissions for housing development, while a few had been previously refused permission. It should be noted that some planning permissions (and development plan site allocations) may cover two-or-more SHLAA sites, while others may only relate to part of a SHLAA site.
- 4.78. Additionally, the consultations on the Regulation 18 draft Northumberland Local Plan during summer 2018 and on the Regulation 19 publication draft Local Plan in early 2019 drew in significant numbers of responses relating to numerous sites as part of formal representations. However, while some further new sites were put forward through these consultations, the majority of representations were again reasserting their proposers' views that their previously-submitted sites (including many sites within the Green Belt) were suitable/available/achievable for housing development and thus seeking for them to be allocated for development in the Local Plan. Information from these representations was nevertheless used to update the SHLAA site assessments as appropriate.
- 4.79. The additional developer consultation carried for the Local Plan examination in January/February 2020 gained further useful information for many as-yet-unpermitted potentially 'developable' Local Plan-compliant sites.
- 4.80. The latest targeted consultation with developers/landowners/agents between 23 June 23 July 2021 (with subsequent direct chasing-up where necessary) gleaned a lot of further updated post-Covid-19 lockdowns information about the latest anticipated housebuilding delivery rates on permitted large and medium-sized sites. Through this consultation, updated year-by-year build-out rate information was received for 74% of permitted SHLAA sites of 5-or-more dwellings capacity, but accounting for 94% of the site-specific dwellings that have been assessed to be 'deliverable' within the 5-year supply.
- 4.81. Where no up-to-date data was received, the anticipated delivery rates have been informed by responses received to previous developer consultation responses, rolled forward and sense-checked as appropriate. The projected delivery on 17% of permitted SHLAA sites, but representing only 5% of the site-specific dwellings in the 5-year supply, has therefore been based on the methodology assumptions set out in Appendix B. The majority of these sites are, however, already implemented / under construction and delivering completions and/or involve sites with a relatively small number of dwellings.
- 4.82. Hence, it is considered that there is a high degree of robustness in the calculation of the 5-year supply and overall SHLAA trajectories.

# 5. SHLAA and Five-Year Housing Supply Results

- 5.1. This section sets out the results of the updated site assessments and key findings of the 2021 SHLAA and 5-year housing land supply analysis.
- 5.2. The Northumberland SHLAA database now consists of over 4,000 sites (excluding sites now completed) and that are of either an overall gross area of 0.2 hectares (ha) or more, or that can demonstrate capacity to potentially deliver five-or-more self-contained dwellings. Details of each site assessment are presented in the separately-appended site schedules, with the sites listed and identified by a SHLAA site reference number.
- 5.3. The potential supply realised from 'deliverable' and 'developable' sites provides the evidence that directly informs the housing trajectories. The forecasted delivery from these specific sites will meet the identified monitoring requirement for new homes over the next 15 years and beyond.
- 5.4. This report and the accompanying site assessment schedules are also supported by spatial GIS mapping, which can be viewed via the digital SHLAA map on the Council's website. This shows the location, boundaries and basic details of individual sites, including the conclusions on their potential suitability, availability and achievability, and therefore whether they would offer a 'deliverable' or 'developable' location for possible future residential development, together with the indicative yield/capacity of dwellings that could be accommodated on the site. The online map is updated on publication of each SHLAA. Again it is important to remember that the assessment of a site through the SHLAA represents the position at a specific point in time based upon the information available when the site was assessed.
- 5.5. As previously explained, the SHLAA and 5-year housing land supply assessment do <u>not</u> give land any planning status. While a site may be assessed as being potentially suitable and 'deliverable' or 'developable' for possible residential development, this does <u>not</u> mean that planning permission will necessarily be granted, that the site should be allocated in the development plan, or indeed that it gives any presumption as to the most appropriate use of the site. The SHLAA and 5-year housing land supply assessment form part of the evidence base and serve as a material consideration in planning decisions, but the actual allocation of land for different uses and the determination of individual applications will be made through the correct plan-making and decision-taking processes, through the formulation of planning policy and development management procedures respectively.
- 5.6. Similarly, sites that are assessed to be 'not currently developable' could still be granted planning consent in specific circumstances, subject to an appropriate scheme being positively determined following submission of a planning application, with the applicant likely to need to show that the identified constraints or factors that impacted on the site's assessment could be satisfactorily overcome. However, by virtue of the conclusions drawn, the sites within this category do not presently make

any contribution to the 'deliverable' and 'developable' supply of housing land and thus towards meeting the county's future housing requirement. Such sites do not therefore contribute to the current housing trajectory.

## Five-Year Housing Land Supply of Deliverable Sites

- 5.7. The SHLAA site assessments identified 193 specific 'deliverable' sites, totalling some 772ha, that are considered to be potentially suitable for housing development, are available now and have a realistic prospect of delivering development within the next five years (between 1 April 2021 31 March 2026). Together, they have capacity for an indicative 7,589 outstanding net additional dwellings. Application of the justified 'small sites windfall allowance' at an average 100 dwellings per annum would add a further 500 homes to this potential supply, resulting in an overall total 5-year 'deliverable' housing land supply of 8,089 net additional dwellings.
- 5.8. The sources of Northumberland's supply of potentially 'deliverable' housing sites are summarised in Figure 8 below, with a summary schedule of all live permissions and 'minded to approve' application sites at Appendix D.
- 5.9. The site assessments reflect the NPPF definition of 'deliverable' sites, whereby sites that are not 'major' development (i.e. less than 10 dwellings indicative capacity or less than 0.5ha in size) and those with detailed planning permission are considered to be 'deliverable' until such time as their extant permission expires/lapses (unless evidence suggests otherwise e.g. they are no longer viable, there is no longer a demand for the type of units permitted, or they have longer-term phasing plans). Sites with outline planning permission, allocated in development plan documents, with Permission in Principle (PiP) or identified on the Brownfield Land Register have only been assessed to be capable of delivering some dwelling completions within the next five years where there is clear evidence of their likely deliverability. All sites on the Brownfield Land Register are included in the SHLAA, while Northumberland presently has no sites benefiting from Permission in Principle, either through the Brownfield Land Register or via applications.
- 5.10. As regards the likelihood of planning permissions to lapse unimplemented, the SHLAA site assessments have built in consideration of this as far as is reasonably possible. As a consequence, 46 dwellings on 4 permitted SHLAA sites have been assessed to not be achievable within the plan period and have thus been assumed to be likely to lapse before implementation, together with 421 dwellings discounted on 21 implemented sites that are not considered likely to deliver any (further) completions. A further 13 permitted SHLAA sites (some already having commenced on site and even delivered some completions already) involving 361 outstanding dwellings have also been filtered out of the 5-year supply as being unlikely to deliver any (further) completions within the next five years, but are still considered to have potential to deliver some completions later in the plan period from year 6 onwards. The conservative approach to the small sites 'windfall' allowance at below recent past trends additionally builds in an element of deliverability and possibility of some permissions lapsing (only 500 of the 901 outstanding permitted dwellings are assumed to contribute to the 5-year supply).

#### Figure 8: Northumberland Five-Year Housing Land Supply of Deliverable Sites 2021-2026

Deliverable in Principle Sites		No. of Sites	Forecast Net Additional Dwelling Completions 2021-2026
Permitted non-major small sites of	N/A	(see 'small sites windfall allowance')	
Permitted major and non-major SHLAA sites of 5+ dwellings	- Full Planning Permission or Outline Permission with detailed Reserved Matters	220	6,927
Permitted non-major SHLAA sites of 5-9 dwellings (or <0.5ha)	- Outline Planning Permission (detailed Reserved Matters not yet approved)	7	38
Permission in Principle (by application)	- Technical Details Consent approved	-	-
Permission in Principle (Brownfield Land Register Part 2 - 5+ dwellings or >0.25ha)	- Technical Details Consent approved	-	-
Other Potentially Deliverable Sit	es		
Permitted major SHLAA sites of 10+ dwellings (or >0.5ha)	<ul> <li>Outline Planning Permission (detailed Reserved Matters not yet approved)</li> </ul>	15	624
Permission in Principle (by application)	- Technical Details Consent not yet approved	-	-
Permission in Principle (Brownfield Land Register Part 2 - 5+ dwellings or >0.25ha)	- Technical Details Consent not yet approved	-	-
'Minded to Approve'	- subject just to S106 being finalised	-	-
planning applications	- with outstanding matters yet to be resolved and subject to S106 being finalised	-	-
Other Development Plan	- Local Plan	-	-
housing site allocations	- Neighbourhood Plans ('made')	-	-
Other Brownfield Land Register sit currently without planning consent	-	-	
Other Local Plan compliant SHLAA sites of 5+ dwellings currently without planning consent			-
'Small Sites Windfall Allowance' (<5 dwellings capacity - average 100pa)			500
TOTAL 5-year 'Deliverable' Hous	sing Land Supply		8,089

5.11. The identified potential 5-year supply of 8,089 dwellings would equate to an average annual delivery rate of 1,618pa, which is commensurate with the average delivery rate achieved over the past four years since the start of the plan period. The site-specific supply of 7,589 dwellings on sites of at least 0.2ha or 5 dwellings or more capacity would equate to about 1,518pa, with the highest rates of forecasted annual delivery being commensurate with the delivery rates achieved over the past four years<sup>68</sup>. This therefore gives a further indication of the level of reasonableness and confidence in the forecast 5-year supply calculation.

 <sup>&</sup>lt;sup>68</sup> Site-specific 5-year housing land supply year-by-year forecast: 2021/22 - 1,904; 2022/23 - 1,794; 2023/24 - 1,556; 2024/25 - 1,308; 2025/26 - 1,027.

5.12. Northumberland's identified 8,089 housing land supply on deliverable sites is compared against the county's Local Housing Need-based 5-year supply requirement in Figure 9 below. This clearly shows that Northumberland therefore has a 251% 5-year housing land supply, equivalent to about 12.5 years supply of potentially 'deliverable' sites. Northumberland's identified supply of potentially 'deliverable' sites is therefore evidenced to be significantly in excess of its current 5-year housing land supply requirement.

Hou	sing Land Supply Requirement	Net Additional Dwellings
А	Baseline Local Housing Need 2021-2026	3,070 (614pa)
В	+ Buffer (minimum 5% allowance)	154
С	Total 5-year Housing Land Supply Requirement 2021-2026 (A + B)	3,224
D	Average Annual Housing Land Supply Requirement 2021-2026 (C / 5)	645pa
Hou	sing Land Supply of 'Deliverable' Sites	Net Additional Dwellings
Е	Total identified 'Deliverable' Housing Land Supply	8,089
F	'Deliverable' Supply % of 5-year Housing Requirement (E / C)	251%
G	Equivalent Number of Years 'Deliverable' Housing Supply (E / D)	12.5 years

Figure 9: Summary of Northumberland's Five-Year Housing Land Supply 2021-2026

- 5.13. It is worth noting that the potential 6,918 'deliverable' dwellings supply on specific sites with existing full permission or outline planning permissions with reserved matters alone would equate to about 10.7 years supply in themselves against the 5-year requirement (while all current 13,356 outstanding commitments equate to some 22 years supply overall against the baseline Local Housing Need). Furthermore, with about two-thirds (65.2%) of the permitted 'deliverable' supply being on sites already under construction, this provides a good degree of confidence in their delivery.
- 5.14. Additionally, Figure 10 shows that, on the basis of the identified 'deliverable' housing land supply, Northumberland would also have a more than sufficient 5-year housing land supply if measured against the Northumberland Local Plan's objectively-assessed housing requirement (residual 665pa against the overall 885pa requirement see Figure 3). Against the Local Plan figure, the supply would be equivalent to 11.6 years supply with the 5% buffer.

Housing Land Supply Requirement		Net Additional Dwellings			
		Local Housing Need 2021-2026	Northumberland Local Plan Residual Housing Requirement 2021-2026		
А	Baseline Local Housing Need 2021-2026	3,070 (614pa)	3,323 (665pa)		
В	+ Buffer (minimum 5% allowance)	154	166		
С	Total 5-year Housing Land Supply Requirement 2021-2026 (A + B)	3,224	3,489		
D	Average Annual Housing Land Supply Requirement 2021-2026 (C / 5)	645pa	698pa		
Ηοι	Housing Land Supply of 'Deliverable' Sites				
E	Total identified 'Deliverable' Housing Land Supply	8,089			
F	'Deliverable' Supply % of 5-year Housing Requirement (E / C)	251%	232%		
G	Equivalent Number of Years 'Deliverable' Housing Supply (E / D)	12.5 years	11.6 years		

### Figure 10: Northumberland's Five-Year Housing Land Supply Comparison

# SHLAA Housing Land Supply of Deliverable and Developable Sites

- 5.15. The SHLAA identifies 509 specific 'deliverable' and 'developable' large and medium-sized sites of more than 0.2ha or 5 dwellings capacity that would potentially be Local Plan-compliant, of which 219 sites already have full or outline planning permission. This includes the identified site-specific 5-year housing land supply of 7,589 dwellings capacity on 193 potentially 'deliverable' SHLAA sites (totalling 772ha), which contribute to the overall 8,089 dwellings 5-year supply (including the 'small sites windfall allowance' at 100pa) discussed above. A further supply of 316 'developable' sites are identified that are available now or are considered to have a reasonable prospect of becoming available for viable development for achieving housing completions over the subsequent 6-15 years of the plan period.
- 5.16. Several sites are expected to deliver completions within the next five years as well as further completions in the subsequent 6-15 years and beyond the plan period, although the completions figures are not double-counted. In addition to the site-specific 'deliverable' 5-year supply, the supply of 'developable' housing land is considered to be potentially capable of yielding a further 9,393 net additional dwellings between 2026-2036. Adding on the justified 'small sites windfall allowance' (100pa) gives a total potentially 'developable' housing land supply between 2026-2036 for 10,393 net additional dwellings.
- 5.17. Figure 11 outlines the sources of Northumberland's identified supply of 'deliverable' and 'developable' housing sites for the 15-year period 2021-2036 (as at the 31 March 2021 base date). It shows that Northumberland has an overall 15-year housing land supply potentially capable of providing for around 18,482 net additional dwellings (16,982 site-specific supply plus 1,500 small sites 'windfall' allowance). This supply equates to more than twice the Local Housing Need-based 15-year minimum requirement of 9,210 net additional dwellings, and nearly twice the Northumberland Local Plan-based residual 15-year requirement for 9,970 net additional dwellings, and therefore evidences a clear surplus of potential supply.
- 5.18. A summary trajectory and sites schedule setting out the projected year-by-year delivery for all 'deliverable' and 'developable' sites across the plan period are presented separately in Appendix E and Appendix F respectively.
- 5.19. Additionally, longer-term phasing of some larger strategic sites (such as Cramlington South West Sector and the former St. George's Hospital site in Morpeth), together with other potentially suitable and achievable sites, suggests that a further 2,105 potential completions (including 355 dwellings on already permitted sites) are currently forecast to come forward post-2036 beyond the plan period (2016-2036).

#### Figure 11: Northumberland Housing Land Supply of Deliverable and Developable Sites

	No. of	Potential Net Additional Dwelling Completions		
Deliverable in Principle Sites	Sites	Deliverable 2021-2026	Developable 2026-2036	
Permitted non-major small sites of Permission)	of <5 dwellings (Full or Outline	N/A		nall sites Illowance')
Permitted major and non-major SHLAA sites of 5+ dwellings	<ul> <li>Full Planning Permission or Outline Permission with detailed Reserved Matters</li> </ul>	220	6,927	3,864
Permitted non-major SHLAA sites of 5-9 dwellings (or <0.5ha)	- Outline Planning Permission (detailed Reserved Matters not yet approved)	7	38	7
Permission in Principle (by application)	- Technical Details Consent approved	-	-	-
Permission in Principle (Brownfield Land Register Part 2 - 5+ dwellings or >0.25ha)	- Technical Details Consent approved	-	-	-
Other Potentially Deliverable a	nd Developable Sites			
Permitted major SHLAA sites of 10+ dwellings (or >0.5ha)	- Outline Planning Permission (detailed Reserved Matters not yet approved)	15	624	275
Permission in Principle (by application)	- Technical Details Consent not yet approved	-	-	-
Permission in Principle (Brownfield Land Register Part 2 - 5+ dwellings or >0.25ha)	- Technical Details Consent not yet approved	-	-	-
	- subject just to S106 being finalised	1	-	27
'Minded to Approve' planning applications	<ul> <li>with outstanding matters yet to be resolved and subject to S106 being finalised</li> </ul>	6	-	909
Other Development Plan	- Local Plan	21	-	895
housing site allocations	- Neighbourhood Plans ('made')		-	242
Other Brownfield Land Register sites of 5+ dwellings (or 0.25ha or more) currently without planning consent			-	799
Other Local Plan compliant SHLAA sites of 5+ dwellings currently without planning consent			-	2,375
Site Specific 'Deliverable' and 'Developable' Housing Land Supply			7,589	9,393
'Small Sites Windfall Allowance' (	'Small Sites Windfall Allowance' (<5 dwellings capacity - average 100pa)			1,000
TOTAL 'Deliverable' and 'Deve	lopable' Housing Land Supply		8,089	10,393

5.20. In addition to the above supply of Local Plan compliant developable sites, the SHLAA also identifies a further supply of sites that, while not currently Local Plan compliant, could theoretically be considered 'developable'. These additional 204 sites have potential to realise up to around 2,712 dwellings in the longer-term beyond the plan period. These sites have been assessed to be potentially 'suitable' in the context of the SHLAA due to being free from Category 1 constraints or other

issues that are deemed to be 'showstoppers', and include sites lying immediately adjacent to a settlement, currently designated as protected open space, or being within a small village or hamlet. While theoretically 'developable' in the SHLAA (sometimes falling in the 6-10 years or 11-15 years categories), the forecast delivery from these sites is not included in the analysis and housing trajectories below, and there is no reliance on them to meet the housing requirements of the Local Plan. They therefore represent an identifiable contingency group of sites that may provide additional capacity if future monitoring and review suggests that the Local Plan requirement was ultimately not being delivered in some areas.

### Local Plan Delivery Areas Analysis and Housing Trajectories

- 5.21. The distribution of the potential supply of 'deliverable' and 'developable' housing capacity within each of Northumberland's Local Plan Delivery Areas, as well as the parishes or neighbourhood plan areas of the main towns and service centres<sup>69</sup>, is set out in Figure 12 below according to each 5-year period 2021-2026, 2026-2031 and 2031-2036. Some homes on larger strategic development sites are phased for completion beyond the plan period. It should be remembered that the 5-year housing land supply of deliverable sites is only measured at the administrative local authority area level for the county as a whole, and not at any subdivided level such as Local Plan Delivery Areas.
- 5.22. Over half (51%) of the identified site-specific dwellings capacity is within the **South East** Delivery Area, reflecting the more urbanised nature of this part of the county and the fact that it is the focus for a significant proportion of future development close to the Tyneside conurbation. This includes sites within the main towns of Amble, Ashington, Bedlington, Blyth and Cramlington.
- 5.23. A further 23% of the potential dwellings capacity is within the **Central** Delivery Area, which includes Morpeth, Ponteland, Prudhoe and Hexham, again reflecting its proximity to Newcastle and the Tyneside conurbation.
- 5.24. The more rural **North** Delivery Area, which includes the main towns of Alnwick and Berwick-upon-Tweed, provides for over a fifth (21%) of the remaining dwellings capacity.
- 5.25. The rural **West** Delivery Area provides a small, but proportionate, 5% element of the overall capacity. Haltwhistle is the only main town in this delivery area.
- 5.26. The additional small sites 'windfall' allowance provides for about 8% of the county's overall potential future housing land supply.

Amble parish incl. dwellings in Warkworth parish (North delivery area) that are within Amble settlement. East Bedlington and West Bedlington parishes incl. Bedlington and Bedlington Station. Choppington parish incl. Guidepost, Stakeford and Choppington. Seaton Valley parish incl. Seaton Delaval/Holywell, New Hartley, Seaton Sluice/Old Hartley and Seghill.

Seaton Valley parish incl. Seaton Delaval/Holywell, New Hartley, Seaton Sluice/Old Hartley and Seghill. Morpeth neighbourhood area incl. parishes of Morpeth, Hebron, Hepscott, Mitford and Pegswood. Berwick-upon-Tweed and Ord parishes incl. Berwick-upon-Tweed, Tweedmouth and Spittal. North Sunderland parish incl. Seahouses and North Sunderland.

<sup>&</sup>lt;sup>69</sup> Figure 12 Footnotes:

Alnwick neighbourhood area incl. parishes of Alnwick and Denwick.

Mid-Coquetdale neighbourhood area incl. parishes of Rothbury, Thropton, Cartington and Whitton & Tosson.

Delivery Area	Main Settlements (Parish-based)	Completions 2016-2021	Potential Net Additional Dwelling Completions			Total Future Housing
Alea	(Fallsil-baseu)	2010-2021	Deliverable	Deliverable Developable		Supply (15 years)
			0-5 years	6-10 years	11-15 years	
	Amble	264	316	529	251	1,096
	Ashington	758	526	319	245	1,090
	Bedlington	250	181	430	332	943
	Blyth	1,100	551	265	161	977
	Cramlington	839	1,076	732	643	2,451
South East	Choppington	5	90	125	123	338
	Newbiggin-by-the-Sea	45	23	292	146	461
	Seaton Valley	164	193	202	14	409
	Rest of Delivery Area	226	468	269	154	891
	South East sub-total	3,651	3,424	3,163	2,069	8,656
	Morpeth	1,148	1,175	586	377	2,138
	Ponteland	302	201	64	10	275
	Corbridge	62	168	13	0	181
Central	Hexham	146	212	162	31	405
Jentral	Prudhoe	149	274	210	16	500
	Rest of Delivery Area	623	295	61	52	408
	Central sub-total	2,534	2,325	1,096	486	3,907
	Berwick-upon-Tweed	117	474	619	98	1,191
	Belford	40	48	47	48	143
	Seahouses	26	10	66	73	149
	Wooler	28	93	60	63	216
North	Alnwick	370	433	160	70	663
	Rothbury	74	143	0	33	176
	Rest of Delivery Area	705	510	498	105	1,113
	North sub-total	1,360	1,711	1,450	490	3,651
	Bellingham	19	31	58	47	136
	Haltwhistle	19	16	223	69	308
	Haydon Bridge	117	16	49	20	85
West	Allendale	13	0	19	43	62
	Rest of Delivery Area	121	66	80	31	177
	West sub-total	289	129	429	210	768
Northumh	orland Sita-Spacific			6,138	3,255	i
Northumberland Site-Specific 7,730 Housing Land Supply Total		7,589 -	9,393		16,982	
	es Windfall Allowance		500	500	500	1,500
				6,638	3,755	
Northumberland Housing Land Supply Total		upply Total	8,089	10,393		18,482

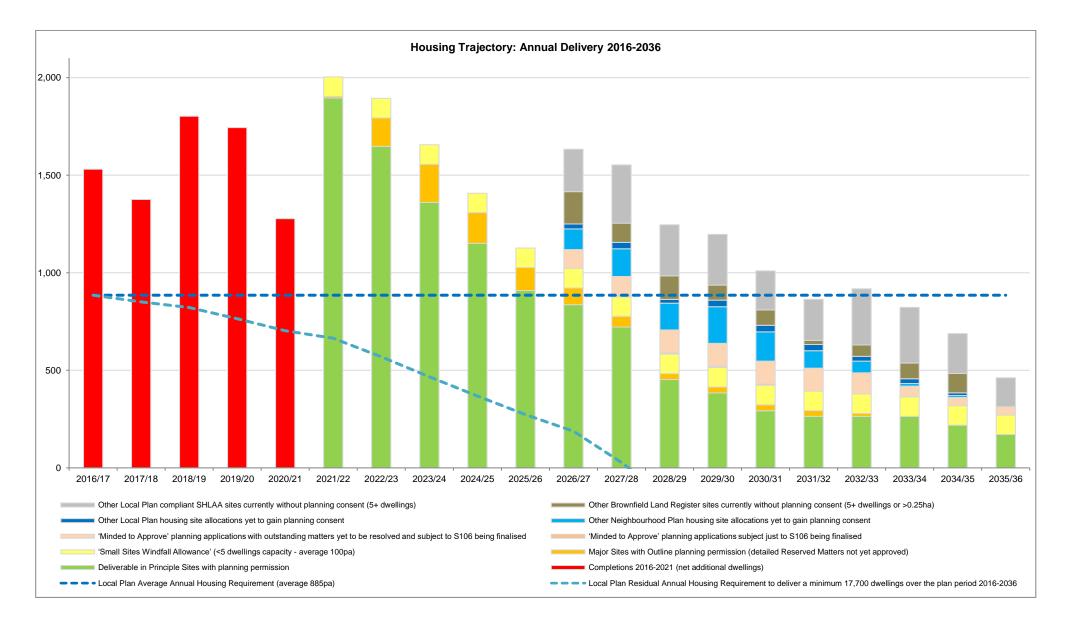
Figure 12: Distribution of Housing Land Supply in Northumberland 2016-2036

- 5.27. In terms of the Northumberland Local Plan's indicative distribution of the county's objectively-assessed housing requirements over its 20-year plan period 2016-2036, and taking into account completions already delivered over the past five years, this analysis suggests that all Delivery Areas have more than sufficient identified housing land capacity to provide for their future needs.
- 5.28. Figure 13 summarises the scale of surplus and/or deficit of housing land supply over the 20-year plan period, taking into account past completions, the identified site-specific supply and the small sites 'windfall' allowance. This SHLAA therefore clearly evidences more than sufficient potential housing land supply to meet the Northumberland Local Plan's identified need for a minimum 17,700 net additional dwellings between 2016-2036 (an excess supply of about 48%).

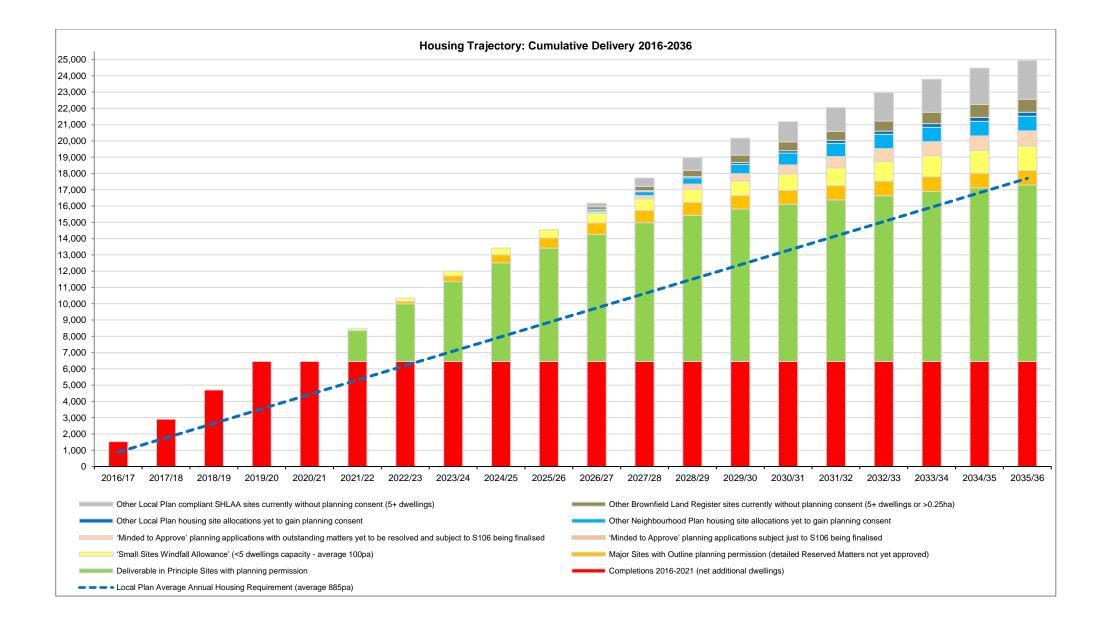
Delivery Area	Local Plan Indicative Housing Requirement Distribution	Completions 2016-2021	Total Site- Specific Housing Supply (2021-2036)	Small Sites Windfall Allowance (pro rata for 15 years) (2021-2036)	Total Completions + Housing Supply (2016-2036)	Overall Indicative Surplus / Deficit (+/-)
South East	9,000	3,651	8,656	209	12,516	+3,516
Central	4,450	2,430	3,907	582	6,919	+2,469
North	3,390	1,360	3,651	544	5,555	+2,165
West	860	289	768	165	1,222	+362
Northumberland Total	17,700	7,730	16,982	1,500	26,212	+8,512

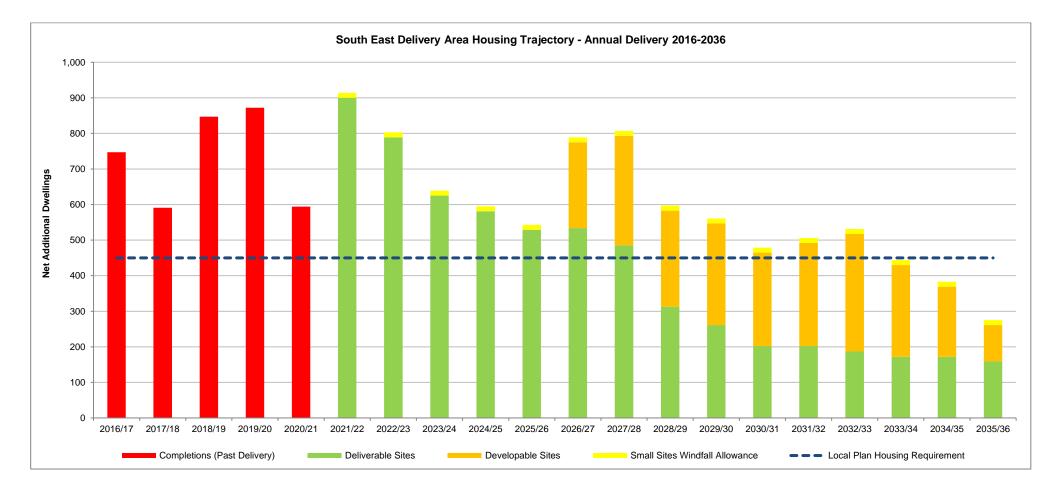
Figure 13: Northumberland Local Plan Housing Land Supply Surplus/Deficit 2016-2036

- 5.29. Reflecting the above evidence and conclusions, Figure 14 below sets out Northumberland's indicative housing delivery trajectories for the county as a whole on an annual and cumulative basis across the plan period 2016-2036. A full yearby-year breakdown summary of the delivery figures is set out in separate Appendix E, with the delivery trajectories for each SHLAA site set out in separate Appendix F.
- 5.30. Figures 15-18 then present corresponding analysis for each of the Local Plan Delivery Areas.
- 5.31. These trajectory graphs illustrate that the countywide minimum requirements and indicative delivery area requirements are largely met by 'deliverable' sites alone, with an excess of potential housing supply evidenced at each spatial level.

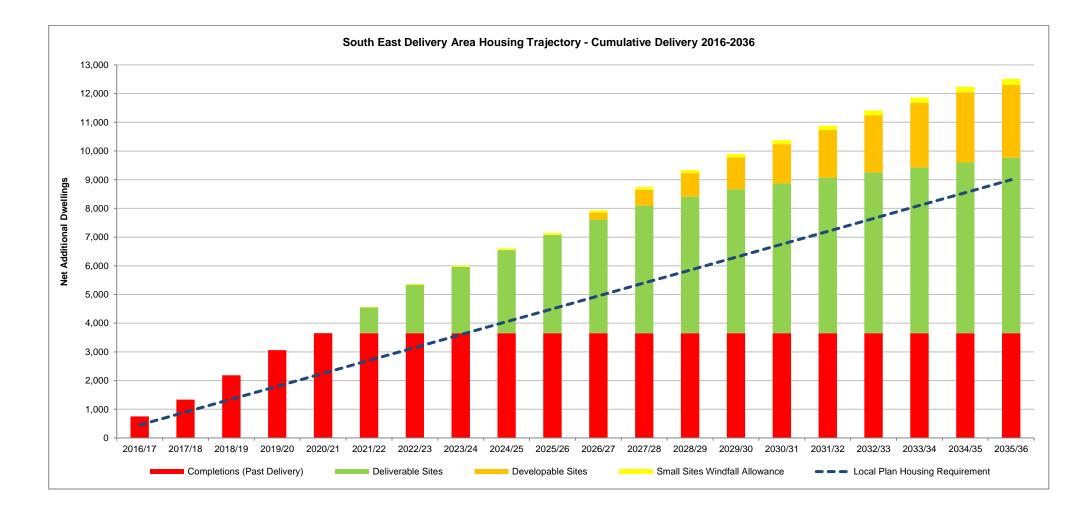


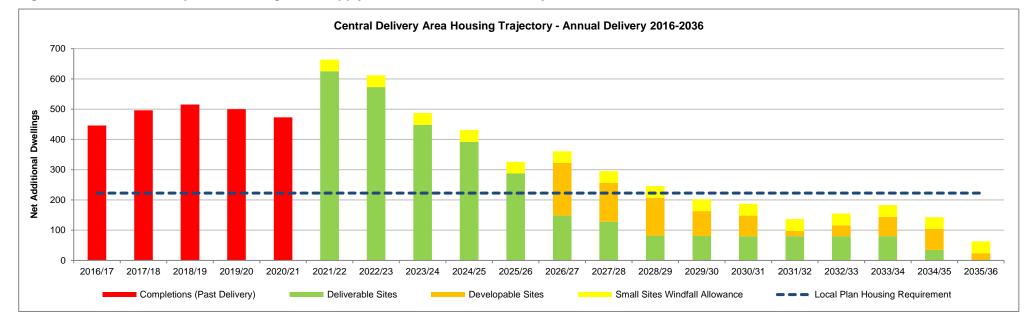
#### Figure 14: Northumberland Housing Land Supply Annual and Cumulative Trajectories 2016-2036



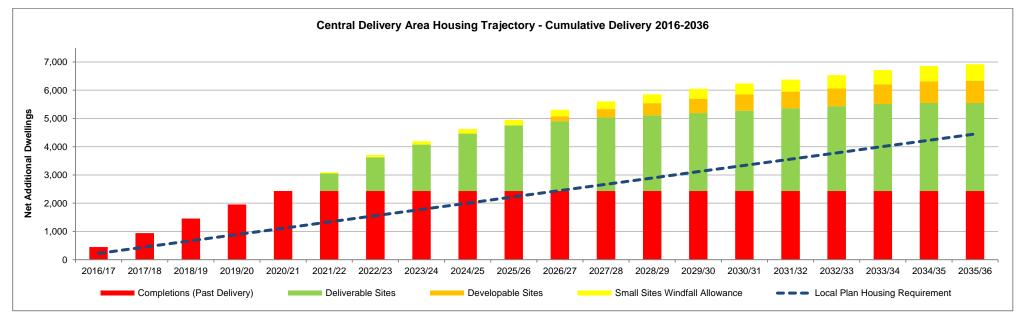


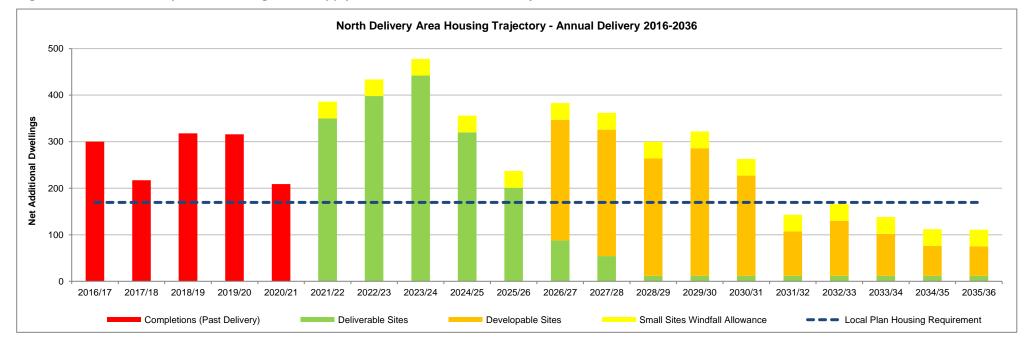
#### Figure 15: South East Delivery Area Housing Land Supply Annual and Cumulative Trajectories 2016-2036



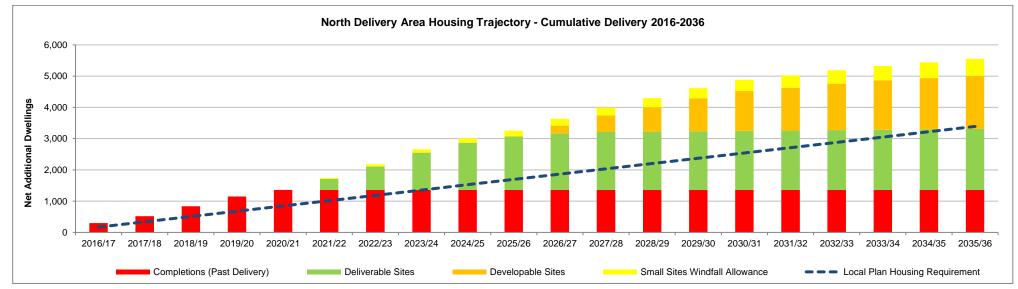


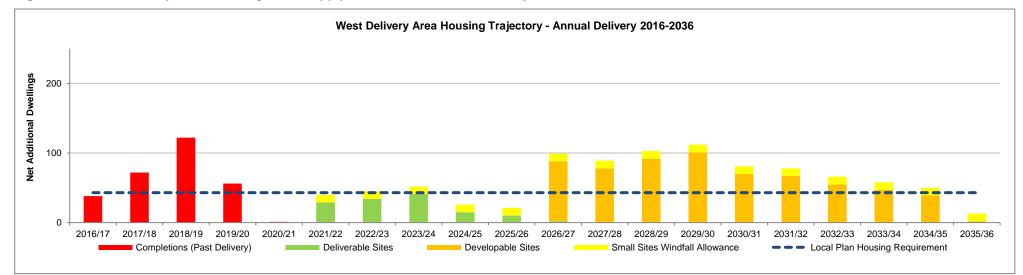




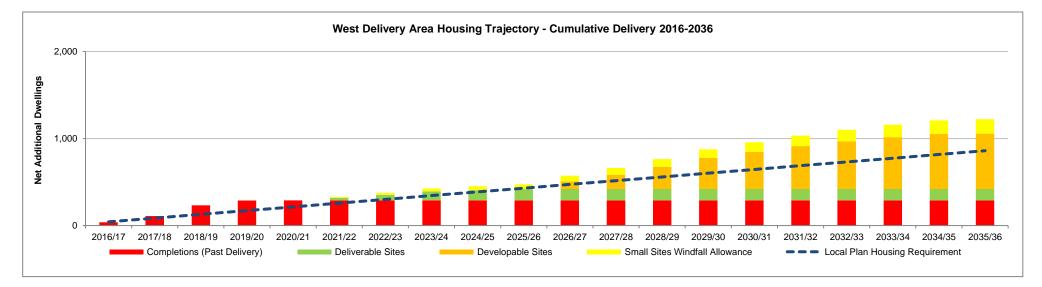








#### Figure 18: West Delivery Area Housing Land Supply Annual and Cumulative Trajectories 2016-2036



#### **Brownfield and Greenfield Land Supply Analysis**

- 5.32. As part of the assessment process, sites are classified according to their current character in terms of whether they are previously-developed 'brownfield' land<sup>70</sup> or previously-undeveloped 'greenfield' in nature, or a mixture of both. It should be noted that the supply of 'brownfield' sites is largely finite, such that as they get redeveloped there inevitably becomes an increasing reliance on releasing 'greenfield' sites for development in order to provide for future growth needs. Furthermore, the longer that 'brownfield' sites remain disused and undeveloped the increasing likelihood that they may become naturally colonised and 'green over', such that in some cases they may evolve to provide a greater biodiversity value than some 'greenfield' sites, and thus may be regarded to have a lower priority for redevelopment.
- 5.33. Figure 19 summarises the breakdown of the identified 15-year site-specific 'deliverable' and 'developable' housing land supply according to this classification of the land within each of Northumberland's Local Plan Delivery Areas.

Delivery Area	100% Brownfield	Mixed Mostly Brownfield	Mixed 50:50	Mixed Mostly Greenfield	<b>100%</b> <b>Greenfield</b> (including Agricultural Brownfield)	Total Housing Sites Supply 2021-2036
South East	1,088	458	101	227	6,782	8,656
Central	502	554	1,584	139	1,128	3,907
North	581	128	141	35	2,766	3,651
West	195	30	13	22	508	768
Northumberland Site-Specific Housing Land Supply Total	2,366	1,170	1,839	423	11,184	16,982

Figure 19: Deliverable and Developable Housing Sites Supply in Northumberland by Brownfield and
Greenfield Land Classification 2021-2036

5.34. This analysis shows that, given the limited supply of previously-developed 'brownfield' sites suitable for residential development, only about 14% of the identified potential housing land supply is on wholly 'brownfield' land. A further 20% of the supply is on sites that involve a mix of 'brownfield' and 'greenfield' land. However, two-thirds (66%) of Northumberland's potential future housing land supply is on wholly 'greenfield' previously-undeveloped land.

<sup>&</sup>lt;sup>70</sup> The NPPF's Glossary defines previously developed land as "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape."

- 5.35. Spatially, the Central Delivery Area has the greatest proportion of its housing land supply involving predominantly 'brownfield' land, with a relatively lower proportion of its housing land supply using 'greenfield' land. Conversely, the South East, North and West Delivery Areas have the much higher proportions of the land supply involving predominantly 'greenfield' land.
- 5.36. It should be noted that not all 'brownfield' sites identified in the SHLAA form part of the <u>Northumberland Brownfield Land Register</u> due to the differing criteria for inclusion of sites within Brownfield Land Registers<sup>71</sup>.

# SHLAA Sites Not Currently Developable

- 5.37. Those sites that have been assessed as not suitable, not available now and/or not achievable within the next 15 years of the plan period are considered to be 'not currently developable', thereby making no contribution to the SHLAA's identified future housing need. While these sites do not form part of the portfolio of 'deliverable' and 'developable' sites, the details regarding the sites, including the full conclusions with regard to their developability, are retained in the SHLAA database. As part of this, the sites continue to be included on the online digital mapping system, but are identified as 'discounted', reflecting the status of being 'not currently developable' for housing development.
- 5.38. For sites that have been assessed as not available, a change in ownership or aspirations, or a discontinuation or relocation of the current or previous use, may enable a site to be considered more favourably in a future update to the SHLAA. It is important to appreciate that a lack of evidence of immediate availability does not alone preclude a site from being potentially 'developable' at some point in the future. Certain sites will not be immediately available for (re)development but, if it has been indicated that this position could be likely to change over the next 15 years of the plan period, their longer-term 'developability' could be viewed in a more

<sup>&</sup>lt;sup>71</sup> PPG re. <u>Brownfield Land Registers</u> (July 2017). The Brownfield Land Register records previouslydeveloped land that is considered to be suitable, available and achievable for residential development, and is therefore <u>not</u> a complete register of all 'brownfield' sites within the Council's administrative area, but only those 'brownfield' sites that are:

<sup>•</sup> at least 0.25ha in size or capable of accommodating at least 5 dwellings; and

considered to be potentially suitable for housing-led development, available now and with development potentially achievable within the next 15 years (including 'deliverable' sites that are potentially achievable within the 5-year housing land supply) – based on the SHLAA and taking account of any constraints and deliverability issues.

It therefore excludes smaller 'brownfield' sites and those assessed to not be suitable for residential development, that are not presently available for development, or where it is considered that development would be unviable or otherwise not realistically achievable within the next 15 years.

Brownfield housing sites under construction nearing completion are also not necessarily included. Derelict/vacant industrial land and premises not considered suitable for alternative housing redevelopment are not included in the Register.

Where some previously-undeveloped 'greenfield' land is within a SHLAA site, only the 'brownfield' part of the site is included in the Register.

<sup>&#</sup>x27;Brownfield' sites planned for a mix of uses are included where they are housing-led development schemes with only ancillary non-housing elements, but they are excluded where the residential element is only an ancillary component of the mixed-use development.

positive light. Through the discussion of availability as part of the assessment process, constraints will be recognised and any development potential will be forecast for the longer term. This reassessment would normally reflect delivery towards the end of the plan period, probably in the '11 to 15 year' period, or indeed beyond. In these particular circumstances, the qualitative aspect of the assessment and narrative surrounding the site will explain the reasoning for the eventual conclusion.

5.39. Finally, a significant upturn in market demand may, in some locations, enhance the viability of sites that have been previously been assessed as not achievable within the next 15 years. Such a change could potentially enable them to be delivered towards the latter part of the plan period. Therefore, following further detailed assessment, or perhaps significant investment in infrastructure to address identified constraints, some sites that have been assessed as being not suitable may in future be considered as 'deliverable' or 'developable'. All sites considered to be 'not currently developable' are included in the full SHLAA sites schedule at Appendix F.

# 6. Risk Assessment

- 6.1. A number of risks are inherently associated with future housebuilding, which may impact upon the successful delivery by the housebuilding market of sites identified in this SHLAA.
- 6.2. It should also be noted in this context that the local planning authority has no powers to influence the rate of delivery of housing completions by private housebuilders on permitted development sites once development has commenced on-site and the planning permission has thus been implemented. Thus the Council has no direct control over housebuilding rates, only being able to monitor progress with completions and seek to ensure that sufficient permissions are granted to potentially enable sufficient numbers of new homes to be delivered to meet the area's latest identified housing needs. Any full planning permission must normally be implemented (ie. construction commenced on-site) within three years of planning consent being granted (although in some cases it can be extended to five years), otherwise the permission lapses. For an outline planning permission, a detailed reserved matters application for all or part of the site must be submitted within three years of the outline consent being granted before it lapses, with development then commencing on-site within two years of the last reserved matters consent before it lapses.

## Economy and the Housing Market

- 6.3. The most significant risk is that associated with wider economic and market conditions, including changing economic policy at a national level.
- 6.4. The local housing market has delivered a significant upturn in housing completions over the past seven years in particular<sup>72</sup>, with a corresponding increase in the numbers of new schemes for residential development that have been proposed and consented through the development management process. The demand for housing sites from developers also presents grounds for optimism and positivity as the plan period progresses.
- 6.5. However, it remains to be seen what the latent impacts of the ongoing Covid-19 coronavirus pandemic will be on housebuilding and the housing market, such as in terms of the consequential population changes (overall numbers and across different age groups), the overall demand for new homes as a result of the economic downturn and the consequent likely greater need for affordable housing. Also the locational demand for new homes and changing dynamics of what people seek from their home as homeworking continues (eg. more open greenspaces, gardens and home office space) with less need to travel into major towns and cities for work. Nevertheless, analysis of completions and commencements suggested that, following the temporary hiatus in construction activities during the first national lockdown in March-May 2020, housing delivery rates had returned to near typical monthly levels by September 2020.

<sup>&</sup>lt;sup>72</sup> Net Additional Homes Provided in Northumberland 2020-2021 (June 2021).

6.6. Furthermore, the UK economy continues to remain relatively fragile at a wider political level given the uncertainties around the impacts of the changing context at a European governance level following the UK withdrawing its membership of the European Union. This 'Brexit' could in turn affect the balance of the housing market across the country, although the consequences are as yet unknown and it will only be over the coming years that the impacts will be fully realised.

### Site Achievability

- 6.7. The assessment of the achievability of sites has been determined on the basis of forecasts provided by developers and landowners, demand across the county's housing market and the likely costs associated with development. The SHLAA identifies a number of large 'brownfield' sites where the costs of development may be more significant than previously considered, such that there is a risk that some sites may not be delivered as anticipated. This could have a significant impact, not only at a site-specific level but also with regard to the successful delivery of the overall strategy for the provision of new homes, at a county-wide and Delivery Area level. While the risks associated with the wider economic climate and national policy cannot be controlled locally, the Council's planning regime can have an effect on the financial burden placed on developers, such as through planning obligations and the possible future introduction of a Community Infrastructure Levy (CIL). In accordance with the NPPF (paragraph 34) and supporting PPG on Viability, the Northumberland Local Plan's policies relating to the planning contributions expected from developments (including for affordable housing provision required and towards other infrastructure such as education, health, transport, flood and water management, green and digital infrastructure) have been robustly tested through its supporting viability assessment evidence to seek to ensure that they do not undermine the deliverability of the plan.
- 6.8. The Government established a requirement for all local planning authorities to prepare and maintain a **Brownfield Land Register** identifying previously-developed 'brownfield' sites<sup>73</sup> of at least 0.25ha or 5 dwellings indicative capacity that are considered to be suitable for potential housing development, are available now and that may be achievable for delivering new homes within the next 15 years. In doing so, the Council has the option to grant '**Permission in Principle**' (PiP) for land identified on the Register (within Part 2).
- 6.9. The Government has also now opened up the option for PiP be gained by way of an application to the Council. PiP has been introduced as a means of speeding-up housing delivery across the country and is designed to provide greater certainty as

<sup>&</sup>lt;sup>73</sup> The NPPF's Glossary defines previously developed land as "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape."

to the potential for residential development on a site, boosting confidence in order to assist delivery.

- 6.10. Similar to an outline planning permission, following the grant of PiP an applicant would then need to gain formal Technical Details Consent (TDC) approval within five years before the site effectively benefits from a full planning permission. Whilst this concept remains in its infancy, and the Council has not considered there to be a need to actively seek to grant any PiP consents for sites on the Brownfield Land Register or received any PiP applications to date, the Brownfield Land Register should go some way to improving the achievability of sites by removing an element of the uncertainty associated with 'brownfield' development and some of the costs associated with securing planning permission.
- 6.11. The <u>Northumberland Brownfield Land Register</u> can be viewed on the Council's website and is updated annually, informed by the latest SHLAA.

### **Infrastructure Delivery**

- 6.12. The successful delivery of a number of the larger SHLAA sites is dependent upon the provision of suitable and appropriate infrastructure. This can include new roads, flood defences and any requirement to increase the capacity of the water supply and sewerage systems, all of which can be critical to enabling an appropriate scheme to be delivered. Funding for the necessary improvements remains an issue. Public subsidy for projects is limited and there is likelihood that this risk will have an impact upon delivery.
- 6.13. However, the successful co-ordinated provision of strategic infrastructure schemes can have a significant positive impact upon the delivery of new housing schemes. As an example, the opening of the Morpeth Northern Bypass in April 2017 brought substantive benefits, including significantly altering the prospects and timescales for delivery of SHLAA sites to the north of the town. Similarly, the proposed reinstatement of passenger services on the Northumberland Line (Ashington, Blyth and Tyne railway) could have major benefits for housebuilding in South East Northumberland by providing a direct rail link from this part of the county into the national rail network and the Tyne & Wear Metro system. This scheme will undoubtedly have positive impacts in terms of commuting and is likely to increase the attractiveness of the housing market in South East Northumberland.

## **Policy Changes and Influence of Assessment**

6.14. While the SHLAA is necessarily largely 'policy neutral', national PPG does make reference to the use of existing and emerging planning policies at the local and neighbourhood planning levels to guide site suitability assessments. This means that some land designations and site allocations may ultimately constrain the potential for housing development and impact upon the outcomes of assessments, over-and-above those designations and uses identified under the Category 1 and 2 constraints criteria (see Section 4 for the detailed methodology). Consequently, when existing and future development plan policies are applied these will have a moderate impact upon the delivery of sites. Following work undertaken for the

recent Local Plan examination actions, the analysis in this SHLAA has been informed by an exercise to narrow down the potential future supply to seek to better reflect the scale of potential housing land supply that may be more likely to be development plan-compliant, particularly in terms of settlement boundaries as well as Green Belt designations. For example, the SHLAA previously identified sites in certain locations that were concluded to be potentially 'deliverable' or 'developable', but which may not have aligned with the development plan's spatial strategy and strategic objectives. As a result, while the SHLAA may have previously identified that these site had the potential to contribute significant numbers to the future housing supply, they may ultimately now be considered less favourably through the development management process.

- 6.15. The role of the SHLAA should be remembered, notably that the study does <u>not</u> make any judgment with regard to policy formulation or development management decisions. It is simply a strategic evidence base assessment to consider the theoretical capacity for future residential development.
- 6.16. The detail and content relating to a specific scheme proposed for a site is often not available to the local planning authority when officers undertake an assessment through the SHLAA process. The submission of a site for consideration in the SHLAA will typically just be the first stage of the process, with further work being necessary before a planning application could be submitted or a masterplan developed, although the site assessments will continue to be regularly reviewed and updated to reflect the most recent information available. For example, a site could initially be considered as not suitable through the SHLAA, a conclusion that will have been based upon the best information available to the local planning authority at the time of the assessment, but subsequently it may be considered suitable through the development management process following the submission of more detailed information, evidence and consideration of any proposed mitigation measures to inform determination of a planning application.

## **Cumulative Impact of Delivery**

- 6.17. The cumulative impacts of site development is something that needs to be taken into account when the practical elements of housing delivery are further explored. These could relate to issues such as site constraints or environmental impacts, or market factors and characteristics.
- 6.18. For instance, in considering constraints, the highway network may have the capacity to support the development of one site in a particular location, but the traffic generated from several new sites together may be unacceptable. In other cases the environmental impacts arising from the development of a number of sites around a village may be unacceptable, even though each site, on an individual basis, is considered to be potentially acceptable on environmental grounds.
- 6.19. Market factors are also an important factor. There may be capacity and market demand to enable the delivery of a certain number of homes in a particular location or settlement but potential oversupply beyond this threshold could impact upon the achievability and/or viability of schemes. This could be particularly apparent in

areas of lower demand or lower values, whereby only a finite number of new homes could reasonably be supported. This could have an impact upon the total number of dwellings that can be delivered in particular locations over the coming years.

#### **Best Available Information**

6.20. The site assessments have been conducted based upon the best, most robust information available to the Council at the time. For example, the impact of identified constraints may, in some instances, have led to an underestimate of future delivery, but in reality it may be that the identified constraints are not as significant as initially thought. This could also result in some sites that have been previously discounted in the SHLAA having the potential to deliver housing, or enable potentially 'developable' sites to provide for delivering homes more quickly than previously anticipated. The regular reviewing of SHLAA sites and continuous engagement with stakeholders nevertheless seeks to ensure that any new information is reflected in the site assessments at the earliest opportunity.

# 7. Conclusions

- 7.1. This SHLAA identifies a supply of potentially 'deliverable' housing sites that could provide capacity to deliver 8,089 net additional homes over the 5 year period 2021-2026. This equates to a 251% 5-year housing land supply when compared to Northumberland's minimum Local Housing Need for 3,224 net additional homes between 2021-2026, equivalent to about 12.5 years supply of potentially 'deliverable' housing sites. When measured against the Northumberland Local Plan's minimum 5-year residual requirement for 3,489 dwellings between 2021-2026, this supply of 'deliverable' housing land would equate to about 11.6 years supply.
- 7.2. The SHLAA also demonstrates that the housing requirements, as set out in the Northumberland Local Plan, for the period 2016-2036, are achievable. It identifies, in addition to the 7,730 net additional dwellings completed during the first five years of the plan period (2016-2021), a potentially 'deliverable' and 'developable' supply of housing land capable of accommodating an indicative 18,482 net additional homes over the next 15 years. It also identifies a contingency supply of circa 2,172 dwellings from potentially 'developable' sites that are not currently Local Plan compliant but may have scope for delivery in the longer-term subject to policy considerations, in addition to a further 2,105 completions on 'deliverable' and 'developable' that are currently forecast for delivery beyond the plan period
- 7.3. This gives an **indicative housing land supply capacity in Northumberland of at least 26,212 homes over the full plan period 2016-2036**, and possibly up to around 28,384 dwellings if including the contingency sites. This level of supply **far exceeds the Local Plan's minimum housing requirement of 17,700 dwellings** and provides a plentiful cushion to meet future housing need. It also demonstrates that there is surplus capacity to deliver the indicative housing requirements for each Delivery Area in the Local Plan.

# Appendices

# Appendix A: 'Category 1' and 'Category 2' Constraints

Category 1 Significant Constraints	Category 2 Constraints
<ul> <li>Natural Environment:</li> <li>Ramsar Convention Wetlands Sites</li> <li>Special Protection Areas (SPA)</li> <li>Special Areas of Conservation (SAC)</li> <li>Sites of Special Scientific Interest (SSSI)</li> <li>National Nature Reserves (LNR)</li> </ul>	<ul> <li>Local Nature Reserves (LNR)</li> <li>Local Wildlife and Geological Sites (LWGS)</li> <li>Protected Species or Habitats</li> </ul>
Landscape: • Ancient Woodlands	<ul> <li>National Park</li> <li>Area of Outstanding Natural Beauty (AONB)</li> <li>Heritage Coast</li> <li>Historic Landscape</li> <li>Green Belt</li> </ul>
<ul> <li>Historic Environment:</li> <li>Scheduled Ancient Monuments (SAM)</li> </ul>	<ul> <li>World Heritage Site (WHS)</li> <li>Grade I Listed Buildings/Structures</li> <li>Grade II* Listed Buildings/Structures</li> <li>Conservation Areas</li> <li>Archaeological Sites</li> </ul>
<ul> <li>Open Space:</li> <li>Historic Parks and Gardens</li> </ul>	<ul> <li>Designated Open Spaces</li> <li>Non-designated Open Spaces</li> <li>Allotments</li> <li>Existing Car Parks</li> </ul>
<ul> <li>Hydrological:</li> <li>Flood Risk Zones 3b (Functional Floodplain)</li> </ul>	<ul> <li>Flood Risk Zones 3a (High Vulnerability)</li> <li>Flood Risk Zone 2 (Medium Vulnerability)</li> </ul>
<ul> <li>Natural Resources and Hazards:</li> <li>Health &amp; Safety Executive (HSE) COMAH Inner Zones</li> </ul>	<ul> <li>HSE COMAH Middle and Outer Zones</li> <li>Minerals Safeguarding Areas</li> </ul>

# Appendix B: SHLAA Methodology Site Delivery Assumptions

	Delivery Assum	ptions
Sites with Planning Consent	Completions Start Year	Delivery Rate (dwellings per annum, dpa)
Extant sites under construction - planning permission implemented but development yet to be fully completed	Where no information is submitted or no relevant delivery history completions will start in year 1	Delivery informed by completions rate achieved over previous years; or otherwise at no more than 30 dpa*
Extant sites with full permission (or outline permission with reserved matters approved) - development yet to commence	Where no information is submitted completions will start in year 2	No more than 30 dpa*
Extant sites with outline permission (yet to gain reserved matters approval) - development yet to commence	Where no information is submitted completions will start in year 3	No more than 30 dpa*
Sites without Planning Consent		
Large and medium-sized sites (>0.2ha or 5+ dwellings) with an application 'minded to approve' subject only to finalising a S106	Full application - completions will start in year 4	No more than 30 dpa*
agreement	Outline application - completions will start in year 5	No more than 30 dpa*
Other large and medium-sized sites (>0.2ha or 5+ dwellings) with an application 'minded to approve' but subject to outstanding issues yet to be resolved and finalising a S106 agreement	No delivery within first 5 years. Completions will commence no earlier than year 6	No more than 30 dpa*
Sites allocated for housing in the Local Plan or a 'made' Neighbourhood Plan that are currently subject to a live planning application 'pending decision'	No delivery within first 5 years. Completions will commence no earlier than year 6	No more than 30 dpa*
Other 'developable' SHLAA sites - including those with an outstanding planning application 'pending decision' or 'pending consideration'	No delivery within first 5 years. Completions will commence no earlier than year 6	No more than 30 dpa*

\* Indicative delivery rate increased to no more than 60 dwellings per annum on larger sites with two or more active housebuilders on site at any one time. Doubling the site's completions rate is considered to be reasonable and realistic in the light of available local and national evidence, and supports the fact that multiple developers and outlets will allow for increased delivery rates.

## Appendix C: Housing Completions Trends on Small Sites

Monitoring Year	Dwelling Completions on Small Sites <5 Dwellings	Total Dwelling Completions in Northumberland	
2011/12	85 (15%)	558	
2012/13	94 (15%)	621	
2013/14	110 (20%)	559	
2014/15	374 (26%)	1,447	
2015/16	102 (10%)	991	
2016/17	105 (7%)	1,531	
2017/18	112 (8%)	1,376	
2018/19	110 (6%)	1,802	
2019/20	117 (7%)	1,744	
2020/21	89 (7%)	1,277	
Total	1,298 (11%)	11,906	
Annual Average	130 dpa	1,191 dpa	

Net Additional Housing Completions on Small Sites of <5 Dwellings in Northumberland 2011-2021

The apparent anomaly high figure recorded for 2014/15 was in fact the outcome of a comprehensive data cleansing exercise to pick up a number of missed small sites completions from the previous three years. Hence, in reality, the 2011-2014 figures would all be higher while the 2014/15 figure would be lower. This does not, however, affect the averaging of the figures for the past 10 years as a whole.

## Appendices D-F – see separate appendix documents

Appendix D: Five-Year Housing Land Supply of Deliverable Sites Summary Schedule

Appendix E: SHLAA Summary Trajectory of Housing Delivery over the Local Plan Period 2016-2036

Appendix F: SHLAA Sites Assessment and Delivery Summary Schedule

Northumberland SHLAA and 5-year Housing Land Supply 2021

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