



Summary proof of evidence of Ben Pycroft in relation to housing land supply

Outline application for six detached houses at Land at
Manchester Road, Tunstead Milton, High Peak, SK23 9UH

for Mr Garie Bevan

PINS ref: APP/H1033/W/16/3147726

LPA ref: HPK/2015/0351

Project : 14-148
Site address : Land at Manchester
Road, Tunstead Milton,
High Peak, SK23 9UH
Client : Mr Garie Bevan
Date : 06 November 2016
Author : Ben Pycroft

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1. Introduction

- 1.1 This summary proof of evidence is submitted on behalf of Mr Garie Bevan (the Appellant) in support of his appeal against the decision of High Peak Borough Council to refuse to grant outline planning permission for the erection of six detached dwellings at land at Manchester Road, Tunstead Milton, High Peak, SK23 9LH (LPA ref: HPK/2015/0351).
- 1.2 This summary and my main proof of evidence specifically address matters relating to housing land supply. It should be read alongside the proof of evidence prepared by Mr Gascoigne, which deals with all other planning matters.

Qualifications

- 1.3 I am Benjamin Michael Pycroft. I have a B.A. (Hons) and postgraduate diploma in Town Planning from the University of Newcastle-upon-Tyne and am a member of the Royal Town Planning Institute. I am an Associate Director of Emery Planning, based in Macclesfield, Cheshire.
- 1.4 I have experience in dealing with housing supply matters and have prepared and presented evidence relating to five year housing land supply calculations at a number of Local Plan examinations and public inquiries.
- 1.5 The evidence which I have prepared and provide for this appeal (reference APP/H1033/W/16/3147726) is true and has been prepared and given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinion.
- 1.6 I provide this summary alongside my main proof of evidence and set of appendices. I also refer to a number of Core Documents, including those relating to the examination of the High Peak Local Plan.

Proposition

- 1.7 To address the case on behalf of the Appellant, this proof of evidence sets out the proposition that the Council cannot demonstrate a five year housing land supply against its requirement as required by paragraph 47 of the NPPF. The implication of this and all other planning matters are dealt with by Mr Gascoigne.

2. Assessment of the Council's housing supply

2.1 My proposition regarding five year housing land supply is based on six key stages:

Stage 1: Agreeing the base date

2.2 The base date is 30th September 2016 and the five year period is 1st October 2016 to 30th September 2021.

Stage 2: Identifying the housing requirement

2.3 Policy S 3 of the HPLP states that the Council will make provision for at least 7,000 dwellings over the period 2011-2031 at an overall average development rate of 350 dwellings.

2.4 On the basis set out in paragraph 3-030 of the PPG, 350 dwellings per annum should be used to assess the Council's housing land supply against.

Stage 3: Identifying the accumulated backlog

2.5 Against the Local Plan requirement of 350 dwellings p.a., the Council claims that the backlog is 1,045 dwellings. I conclude that it is slightly higher due to some errors in the way the Council has recorded the completions data. I conclude that the accumulated backlog is 1,064 dwellings.

2.6 The backlog is substantial, equating to over 3 years of unmet housing need (i.e. $1,064 / 350$), which has existed since 2011.

Stage 4: Identifying the method of addressing the backlog

2.7 The Local Plan Inspector concluded that the backlog should be addressed over the plan period to 2031 (i.e. the 'Liverpool' method). This was because the Inspector did not consider that the Council would be able to deliver enough houses in the five year period for the backlog to be addressed in full over the same period (i.e. the 'Sedgefield' method). There is no support for this approach in either the NPPF or the PPG. Whilst on the one hand the Inspector concluded that the Sedgefield method would result in an unrealistic annual requirement of around 600 dwellings per annum, on the other hand he endorsed the Council's housing trajectory, which claimed that an average level of completions of over 600 dwellings would be achieved. In my view, the Council's trajectory is completely flawed and this justifies a review of

the supply position. Notwithstanding this, in terms of addressing the backlog, I have found that even using the Liverpool method, a five year housing land supply cannot be demonstrated by a significant margin.

- 2.8 Using the Liverpool approach, the amount of shortfall to be addressed in the five year period is 367 dwellings (i.e. 1,064 dwellings / 14.5 years X 5 years). However, I set out the position with both Sedgefield and Liverpool in my subsequent calculations.

Stage 5: Applying the appropriate buffer

- 2.9 The Local Plan Inspector concluded that a 20% buffer applies. This means that even with the Liverpool method the total supply the Council must demonstrate would equate to 2,540 dwellings (i.e. 2,117 plus 20%). The average annual requirement with the Liverpool method and a 20% buffer is therefore 508 dwellings (i.e. 2,540 / 5 years).

Stage 6: Identifying a realistic and deliverable supply

- 2.10 The Council claims its five year supply equates to 3,544 dwellings. I have assessed the Council's supply and make a series of deductions. The deductions I have made to the various categories are summarised in the table below:

Table A: summary of Appellant's position on supply

Status at base date	No. of dwellings		
	Council	Appellant	Difference
Sites with planning permission			
(a) Sites under construction	294	272	-22
(b) Small sites with planning permission	206	170	-36
(c) Large sites with planning permission	2,040	1,201	-839
Sites without planning permission			
(d) Allocations	771	68	-703
(e) Small sites windfall allowance	180	106	-74
(f) PDNPA contribution	34	35	0
Total	3,544	1,852	-1,692

3. Five year housing land supply at 30th September 2016

- 3.1 In conclusion, based on a housing requirement of 350 dwellings per annum and a backlog of 1,064 dwellings to be made up over the plan period, (i.e. Liverpool method), the total five year requirement equates to 2,117 dwellings (i.e. 1,750 plus a proportion of the backlog equating to 367 dwellings).
- 3.2 A 20% buffer must also be demonstrated to provide a realistic prospect of achieving the five year requirement, which means the total supply that the Council must demonstrate would equate to 2,540 dwellings (i.e. 2,117 plus 20%). The average annual requirement with a 20% buffer is therefore 508 dwellings (i.e. 2,540 / 5 years).
- 3.3 On the supply side, my assessment is that the five year supply position at 1st April 2016 is 1,852 dwellings. Consequently, the five year supply equates to **3.65 years** as is summarised in the table on the following page. If the Sedgefield method were used, the supply would only be **2.74 years**.

Table B: Summary of High Peak's Five Year Housing Land Supply

	Requirement	Liverpool	Sedgefield
A	Net annual requirement (2011 to 2031)	350	350
B	Five year requirement (A x 5 years)	1,750	1,750
C	Backlog 1 st April 2011 to 30 th September 2016	1,064	1,064
D	Backlog to be made up in five years	367	1,064
E	Total five year requirement (B+D)	2,117	2,814
F	Annual average (E / 5 years)	423	563
G	Buffer (20% of E)	423	563
H	Five year supply that must be demonstrated (E + G)	2,540	3,377
I	Annual average (G / 5 years)	508	675
	Supply		
J	Five year supply from 1 st October 2016 to 31 st March 2021	1,852	
	Sites with planning permission		
	(a) Sites under construction	272	
	(b) Small sites with planning permission	170	
	(c) Large sites with planning permission	1,201	
	Sites without planning permission		
	(d) Allocations	68	
	(e) Small sites windfall allowance	106	
	(f) PDNPA contribution	35	
K	Five year supply from 1 st October 2016 to 31 st March 2021 (J/I)	3.65	2.74

3.4 In summary, my evidence concludes that the Council cannot demonstrate a five year housing land supply by a significant margin. The implication of this is dealt with by Mr Gascoigne.