

# **DARLINGTON SHLAA METHODOLOGY REVIEW**

## **CONSULTATION STATEMENT, JANUARY/FEBRUARY 2015**

### **1. Background**

1.1 Ahead of the sixth iteration of the SHLAA document, Darlington's Planning Policy section carried out a 3 week consultation with the appropriate stakeholders with regards to the future methodology of the SHLAA process (see attached at Appendix 1). The consultation was carried out to ensure that the SHLAA document is locally appropriate and is a robust document that is in line with National Planning Practice Guidance (NPPG).

1.2 Over 150 people were consulted, which included a variety of stakeholders including Planning Agents, consultancies, neighbouring Local Authorities and house builders. Reminders were sent out a few days prior to the closing date.

### **2. Main Issues Raised and the Council's Responses**

1.3 Ten responses were received, with a considerable amount of feedback. A summary of the matters raised and the Council's response is in the following section. A full schedule of the comments made and responses to them appear in Appendix 2.

#### **Item 1 - Geographical area covered by the assessment**

##### **Consultation responses summary**

No comments.

**Darlington Borough Council Response :** The text in the SHLAA report on the scope of the assessment will acknowledge the deviation from NPPG.

**Change to Methodology:** None.

#### **Item 2 - Who should plan makers work with?**

**Consultation responses summary:** 8 out of 10 respondents agreed with the Council's proposals to reissue membership invite to a local property agent, and to refresh house builder/ RSL/ landowner representatives if needed. 1 respondent suggested it is crucial to engage with the NPPG groups and especially the LEP. 3 respondents felt it was important to involve the LEP and local businesses. One felt that this could highlight new opportunities for housing.

2 respondents felt that Parish Councils, neighbourhood forums should also be involved, because they can boost the Council's knowledge and understanding when allocating sites. 1 volume house builder asked to be added to the Steering Group, and asked for the group to refresh the representatives.

One respondent questioned if all this additional involvement would lead to delay and need extra resources that may not be available.

One respondent suggested that the Council involve other Local Planning Authorities to determine the approach they are taking as part of their SHLAA preparation and to be aware of any shortfall positions in neighbouring authorities.

**Darlington Borough Council Response:** An invitation to the Steering Group has been issued to the LEP, but it has been declined. An invitation to join the Group has been accepted by Julie Wallin and Nick Carver of Carver Commercial as a local agent and local business representative. All the above can be achieved within the timetable set out.

The Steering Group already has two general volume house builder representatives selected by the regional HBF, and one respondent felt that it was already predominantly house builders, so the request from BDW to join is politely

declined. Inquiries have been made of the HBF whether they want to change their representation on the Group but no reply has been received prior to agenda paper dispatch.

Regarding involving community groups, the neighbourhood forum groups have been asked if there are any sites they want including, but neither has come up with any.

The issue of housing provision shortfalls in adjacent authorities is a matter for other planning policy plan making work under the Duty to Co-operate, not specifically the SHLAA.

The Steering Group will be fully involved in preparing this SHLAA update, through this consultation, the Steering Group meeting and commenting on a draft SHLAA report in due course.

The Inspector references alluded to were to update work done by the Council specifically for that Public Inquiry following the same methodology and assumptions used in the last update (5).

**Changes to Methodology:** Refresh Steering Group as necessary to ensure membership includes parties that are prepared to fully engage. Include a local property agent and local business interest in the Group membership. Issue invite to attend to TVU, the LEP. Invite those preparing neighbourhood plans (Middleton St. George and Blackwell) to submit potential sites.

### **Item 3 - Should the assessment be constrained, e.g. by site size or by the need for development?**

**Consultation responses summary :** All respondents either agreed or had no comments.

**Darlington Borough Council Response:** None.

**Change to Methodology:** None.

### **Item 4 - How should sites be identified & data sources used to ascertain info?**

**Consultation responses summary:** All respondents agreed, one suggesting an addition to the methodology note to indicate that the Council actively seeks to identify sites that might be suitable for development in its desk top review. The same respondent suggests that the Council should make it clear where the site information comes from that informs their allocations, and get a robust site allocations strategy in place, and presses for more community group involvement in the process.

**Darlington Borough Council Response:** Where the Council has information that is not given confidentially regarding potential development sites, it adds these to the SHLAA process. It also reviews the development potential of its own landholdings on a regular basis.

Identifying the source of site information is already done through the background papers that underpin local plan preparation. The Core Strategy (CS1 and CS10) is where the site allocations strategy is set out –see [www.darlington.gov.uk/mgp](http://www.darlington.gov.uk/mgp)

Involvement of community groups is dealt with under Item 2 above.

**Change to Methodology:** Add statement to methodology note to record that the Council actively identifies sites through the desktop review process that may have a part to play in meeting the development needs of an area.

### **Item 5 - Which sites should be included in the site survey?**

**Consultation responses summary :** 6 out of 10 respondents agreed or had no comments on the proposed approach. Other respondents suggested the approach should not use the Council's locational strategy in the LDF in any way to guide the work, and that all sites should therefore be assessed on the basis of the same level of information.

Two respondents suggested only national policies and designations should be considered, but another asked that these also be considered, and the fact be reported if it is already done.

One respondent suggested that as the locational strategy is out of date, in accordance with the PPG, site surveys should be proportionate to the detail required for a robust appraisal, and more detailed where sites are considered to be realistic candidates for development. Any site that meets national policy requirements is a realistic candidate at the moment.

**Darlington Borough Council Response:** Until the OAN is known (which could be in early June 2015), and the extent of any shortfall in the 5 years land supply against that shortfall, it could potentially be a waste of significant resources to underpin the assessments of all sites with the same information. Fuller evidence for sites given a 'light touch' under the current process (e.g. sites in the open countryside unrelated to existing settlements) could readily

be collected, if and when the need to identify more sites arises. The Group would be reconvened to consider this, if so.

**Change to Methodology:** None.

#### **Item 6 – What characteristics should be recorded during the survey?**

**Consultation responses summary :** 6 respondents agree or had no comments to make, 4 disagreed.

One commented that for sites with planning permission that have started, confirmation of progress should be sought from the builder, and it provides a good indication of lead in time to delivery on the ground.

Another suggested that the SHLAA evidence should record the number of starts, as well as the fact that a site has started. They also suggested that the completion of ground works should also be recorded.

**Darlington Borough Council Response:** There may have been some understanding of ‘survey’ here. The Council had taken this to mean ‘site survey’ which is done for the sites without planning permission, but accept it could encompass the desk top survey that the Council carries out on sites with planning permission.

To ensure this SHLAA work is completed on time, most house builders have now already been contacted. The Council would need the timely co-operation of all house builders active in the Borough to collect the ground works information suggested. The number of units started can be collected by the Council from BC/NHBC returns directly.

**Change to Methodology:** In future, DBC to contact all house builders on sites of 6 dwellings or more to find out if/when ground works are expected to be completed.

Number of units started to be added to the trajectory information published in the SHLAA.

#### **Item 7 - How should development potential be calculated?**

**Consultation responses summary :** 5 respondents agreed and made no further comments. 5 disagreed and/or made comments. Respondents questioned whether sketching an indicative layout was a robust and fair approach to determining site capacity. Another respondent suggested this was time consuming and a simple net: gross assumption should be applied, and another mentioned that this did not take account of viability.

One respondent suggested the Steering Group should assess viability by agreeing viability or not of a series of site typologies, and market attractiveness agreed by colour coding different areas.

**Darlington Borough Council Response:** Where developers have submitted draft layouts, these can be used to indicate site capacity, unless the Council is aware of significant planning issues that the layouts do not adequately address, e.g. if they do not take account of a heritage asset. The sketching of an indicative layout is a design led approach to establishing capacity and is more sensitive to site constraints than a purely net: gross density ratio applied to a site area would be. These sketches can be presented to the Steering Group to inform their view on site capacity.

The Council will take a view on this after considering if any design led site capacity assessments are significantly adrift of development schemes that have subsequently got planning permission.

Issues of viability are considered under item 11. below.

**Change to Methodology:** Present sketch layouts on sites where capacity is likely to deviate from standard net: gross figures (e.g. flats sites), to Steering Group to help them agree site capacities, and use illustrative layouts provided by developers, where appropriate. Consider their utility after review of assessments done so far versus schemes that have actually got planning permission.

#### **Item 8 - What factors should be considered for when and whether sites/broad locations are likely to be developed?**

**Consultation responses summary :** 7 respondents agreed, and 3 disagreed and/or made comments.

Two asked for clarification on how the Council assess whether a site is viable before presenting to the Steering Group, and offered assistance to do this. One pointed to the importance of having a local agent on the Group, but questioned the transparency of the Group, given that members have other interests in the Borough.

One asked how the council assesses suitability availability, etc, and suggested that details of sites with planning permission need to be included with a 10% discount applied to sites with unimplemented permissions. Sites known to be likely of failure should be automatically discounted and not considered as part of the 10% discount.

**Darlington Borough Council Response:** The Council does not assess viability in advance of the Steering Group. The Council will share whole plan viability market areas work with the Steering Group to inform the discussion. Alongside the site specific information on constraints/likely abnormalities collected by the Council, the Steering Group collectively has the expertise to decide on whether sites are likely to be viable or not.

The way the Council (and the Steering Group) assess suitability, availability, etc is set out in the published SHLAA methodology.

The Council will publish the information on sites with planning permission. Sites with planning permission known to be not likely to come forward are already discounted to zero. Rather than a 10% discount on the rest, the Council undertakes a more evidence based approach – it carries out telephone surveys to collect information about the landowner/developer intentions for the site and then applies assumptions about delivery agreed by the Steering Group to the rest.

**Change to Methodology:** None.

#### **Item 9 - What factors should be considered when assessing suitability?**

**Consultation responses summary:** 4 respondents agreed or made no comments. One suggested that the Council's proposed approach to item 3 should not include site for less than 6 dwellings, and that the Core Strategy cannot now be used to determine suitability, because the OAN may show that significantly more new houses are needed.

Another respondent urged the council to reappraise other allocated land, revisit constraints and take account of national and sub-regional guidance, whilst NLP suggested that suitability should be guided by market or industry requirements, and that self build plots should not be only those that are too small or have no volume house builder interest.

**Darlington Borough Council Response:** The Council's approach does not include sites of less than 6 dwellings.

The Council acknowledges that the spatial strategy may need to change if the OAN shows that significant additional new housing is required.

There are elements of Core Strategy and saved local plan policies that can still be used, and the NPPF provides some guidance on suitability as well.

It may not be possible to complete the SHLAA this time until the OAN is known. If more sites need to be identified, the Group will be reconvened to see if any of the constraints on potential sites can be overcome.

Regarding self-build plots, the Government is placing increasing pressure on Council's to identify specific land for self-build plots. As the objective of this is to complement and add to existing supply of new housing, it makes sense to identify sites where there is little or no interest from other parties, and no constraints that cannot be overcome.

**Change to Methodology:** This time, if more sites need to be identified when the OAN is known, the Group will be reconvened to see if any of the constraints on potential sites can be overcome.

No change is proposed regarding approach to identifying self-build plots.

#### **Item 10 - What factors should be considered when assessing availability?**

**Consultation responses summary:** 9 respondents agreed or had no comments. BDW would advise the council to look at the delivery record of the developers or landowners putting forward sites and whether the planning background of a site shows a history of unimplemented permission. The council should also reconsider the availability of sites with planning permission.

**Darlington Borough Council Response:** The Council will look at whether it can establish robust information about the delivery record of developers and landowners putting forward sites.

Problems envisaged relate to developers and landowners who have not previously been active in the Borough, or who may have progressed a scheme through atypical market conditions or on a site with unanticipated abnormalities.

**Change to Methodology:** None.

**Item 11 - What factors should be considered when assessing achievability Including whether development is viable?**

**Consultation responses summary:** 8 respondents agreed or had no comments to make, although one was an agreement with reservations. 2 respondents disagreed. No respondents suggested that individual site viability be undertaken, but suggestions included looking at values in housing market sub areas and getting a broad understanding of abnormal development costs of sites. One respondent also had reservations around how the Steering Group could reflect a potentially wide variation of company positions on viability and build out rates. In response to Item 7 above, one respondent suggested the Steering Group should assess viability by agreeing viability (or not) of a series of site typologies, and market attractiveness agreed by colour coding different areas.

**Darlington Borough Council Response:** The Council has been collecting information about values in housing market sub areas for its whole plan viability work, and this can be made available to inform the Steering Group discussion, and is similar to the colour coding idea suggested.

Regarding understanding abnormal costs, the stakeholder information that we get back from statutory and other consultees identifies the main issues that could result in abnormal costs, but the Council and its consultees generally does not have the resources to convert this into costs – that is the expertise that the house builder members of the Steering Group bring to the table.

Sites are not discounted if a house builder does not already have an interest in it, but is reflected in a longer ‘time to first completion’ assumption.

Also to clarify, information about actual completions is collected by the Council. Where first-hand information about future build out rates cannot be obtained, past completion rates are used to inform estimates of future completions.

**Change to Methodology:** More detailed site assessment sheets will be published as an Appendix to the SHLAA, as well as the summaries about site constraints included within the document.

**Item 12 - What happens when constraints are identified that impact on suitability, availability and achievability?**

**Consultation responses summary:** 6 respondents agreed or had no comments to make. 2 disagreed and 2 made comments. Disagreement was to the approach that discounts sites on the basis of constraints, which might be surmountable. It was suggested that more needs to be done on ‘how’ constraints can be overcome, including actively engaging landowners/developers to see if they can assist in overcoming constraints. The policy constraints identified should also be reviewed, given the recent Gladman appeal decision.

**Darlington Borough Council Response:** Agreement responses noted. There is already a table in the SHLAA (5.6 in Update 5) that sets out how constraints identified are being addressed. The Council is being as proactive in addressing these constraints as time and resources allow, and engages with developers/landowners where sites are within scope for consideration as housing allocations in a DPD. The information about policy constraints will be updated to reflect current policy circumstances.

**Change to Methodology:** None.

**Item 13 - How should timescale & rate of development be assessed & presented?**

**Consultation responses summary :** 5 respondents agreed, 3 disagreed, 2 made comments. Those disagreeing suggested that build out rates of sites already underway should also be looked at, and that multiple developers can sometimes reduce typical delivery rates, though otherwise could deliver at up to 60 dwellings per annum, provided there is not market saturation of similar sites. They also suggest that the methodology should say who the phone survey was carried out with.

**Darlington Borough Council Response:** Past build out rates information is collected and used where first-hand information on future build out rate is not available.

The assumptions about higher building rates where more than one developer is present were provided by the HBF in 2008 and the Council is not aware that this has been replaced or rescinded. It will reality test the proposed alternatives with the HBF and Steering Group.

Notwithstanding the above, if there is specific evidence of lower build out rates arising in Darlington, this would be reflected in the trajectory.

Telephone interviews are with the agents/landowners/developers who applied for the planning permission, to get first-hand information about intended timing of delivery and build out rates. The Council can reference the lines of data for which telephone contact was made. A local agent is to be added to the Steering Group, and their input could be useful where no telephone survey could be conducted.

**Change to Methodology:** As proposed in consultation, plus: Local property agent (Carvers) to be added to the Steering Group, reality check with Steering Group suggested 60 dpa build out rate for sites with multiple developers, and contact HBF to see if an update to 2008 letter regarding build out rates could be provided. The Council will reference the lines of data which are from telephone survey.

#### **Item 14 - Determining windfall allowance.**

**Consultation responses summary:** 7 respondents agreed and made no further comments. One respondent pointed out that historic delivery is 27 dpa from windfalls, and that any figure used should be robustly evidenced, and should reflect the previous year's delivery. One respondent disagreed, saying that compelling evidence needs to be provided, another that forecasts should be only related to previous years data and another that future trends should be taken into account.

**Darlington Borough Council Response:** The Council considers its approach to projecting the contribution of windfalls to be based on compelling evidence, taking into account several years past completions data from this source and identifying new sources, e.g. arising from changes to PD rights. Because of the effect of these changes, relying on previous years data only for the projection could significantly under forecast, and allows future trends to be picked up and reflected.

**Change to Methodology:** As proposed in consultation.

#### **Item 15 - How should the assessment be reviewed?**

**Consultation responses summary :** 9 respondents agreed or had no comments to make, one disagreed and made comments. Those commenting asked that forecasting forward must include sites planning permission, and that these should make up a large proportion of the Council's 5 year supply, and that sites without planning permission should be in years 4 and 5 only. One suggests that risk assessment only needs to be in the text, not for each site.

**Darlington Borough Council Response:** Data on sites with planning permission is collected and reported in the SHLAA – e.g. see Section 6 of Update 5. The Council accepts that some of its assessments of delivery on sites without planning permission for the Gladman appeal were over optimistic, and is revisiting these.

Limiting the inclusions of sites without planning permission in years 4 and 5 only seems arbitrary though, particularly where the Council has evidence, e.g. because of progress on a land sale, that it will come forward earlier.

**Change to Methodology:** As proposed in consultation, plus to propose an approach to Steering Group that only includes sites without planning permission in years 4 and 5, unless there is specific contrary evidence available.

#### **Item 16: What if the trajectory indicates there is not enough supply to meet the objectively assessed need? If more land is needed, what is the balance between housing need and constraints on the use of land?**

**Consultation responses summary:** 6 respondents agreed or had no comments to make on the proposed approach. 4 made comments. Those commenting suggested that a full unconstrained OAN needs to be established as soon as possible, and then the new local plan housing requirement. A High Court decision is cited in support. They also suggest that without a 5 year supply, the Council must encourage housing sites to come forward through planning applications and grant planning permission, in line with NPPF, to plug the gap. One points out that there are no overarching constraints outlined in policies within the NPPF such as Green Belts and AONBs that apply in the Borough of Darlington.

One respondent suggested that the existing approach (recalling the steering group) was preferred, to consider the evidence further and make further investigations, e.g. about whether Council owned sites could be brought forward earlier or constraints overcome differently. They go on to say that other suitable sites should be identified, the

viability of sites revisited by looking at policy burdens and if the need cannot be met locally, look at other LPAs to co-operate.

Another respondent says that to meet the identified need, it may be appropriate for the Council to review its Core Strategy and if it cannot identify enough land to meet the identified need they should actively engage with neighbouring authorities within the housing market area under the Duty to Cooperate.

One respondent notes the pro-activeness of the Council to release its own land but this has been found to not be enough, and that a review the Core Strategy would allow the Council to opt for a more appropriate spatial strategy that would see sustainable development located near existing key facilities and essential services across the borough.

**Darlington Borough Council Response:** The Council is commissioning work to establish the full OAN and to undertake an up to date SHMA. The initial OAN may be known in June 2015. Planning applications for new housing will be considered against the NPPF and the relevant up to date policies of the adopted development plan. The Council is considering how proactive and in what circumstances it should be in encouraging planning applications for new housing. The Council does not envisage not being able to meet its OAN within the Borough. It will also consider the role that the Steering Group could have in identifying more land for housing and getting constraints removed.

**Change to Methodology:** The Council will consider the role that the Steering Group could have in identifying more land for housing and getting constraints removed.

#### **Item 17: IDENTIFYING SITES OR BROAD LOCATIONS BEYOND 5 YEARS.**

**Consultation Responses Summary:** 8 respondents either agreed or had no comments to make, and 2 made comments. One respondent suggested the Council needs to identify specific sites for up to 15 years. Another respondent notes that the Core Strategy may not contain sufficient sites to meet the areas objectively assessed needs (OAN), requiring further sites to be identified.

**Darlington Borough Council Response:** Agreements welcomed and noted.

NPPF only requires local planning authorities to identify a supply of specific, developable sites or broad locations for growth *where possible* for years 11-15 of the plan period, so the Council's current approach is in accord with that. The Council acknowledges that there may be further housing needs in excess of the planned Core Strategy requirement, and will seek to address any through a DPD as soon as work to establish the OAN has been completed, as indicated in the proposed approach that was consulted on.

**Change to Methodology:** No change.

#### **Item 18: CORE OUTPUTS**

**Consultation Responses Summary:** 8 out of 10 responses agreed or had no comments. Those disagreeing mentioned that sites with planning permission must be included in the trajectory, and one suggested that detailed reasons be given for all sites submitted.

**Darlington Borough Council Response:** Sites with planning permission are included in the trajectory and discussed in the SHLAA (e.g. see section 6 of Update 5). Sites are only excluded if there are specific reasons to do so, e.g. the developer is known to now not be proceeding with it or an unexpected constraint has emerged affecting viability.

**Change to Methodology:** None other than proposed approach set out in consultation.

#### **Item 19: DETERMINING DELIVERABILITY AND DEVELOPABILITY IN RELATION TO HOUSING SUPPLY**

**Consultation Responses summary:** All 10 responses agree.

**Darlington Borough Council Response:** Not required.

**Change to Methodology:** As proposed in consultation document – referencing footnotes 11 and 12 of NPPF in the SHLAA.

#### **Item 20: STARTING POINT FOR 5 YEAR SUPPLY:**

**Consultation Responses summary:** 5 respondents agreed, 5 disagreed and/or made comments.

Comments made stressed that the need to establish a full OAN is vital and the SHLAA should focus on delivering the OAN, in accordance with particularly paras 14, 47, 152 and 159 of NPPF. They comment that the OAN would provide the benchmark for the assessment of the presence/absence of 5 year supply. The OAN should be established in parallel with the SHLAA.

**Darlington Borough Council Response:** The objectively assessed needs exercise will be a separate technical exercise to the SHLAA, though the final figure from that work would provide the benchmark for the assessment of presence/absence of 5 year supply. This means that the SHLAA process may not be able to conclude until the OAN work is completed. It is currently anticipated that this could be in May 2015.

**Change to Methodology:** None proposed, though the benchmark against which the 5 year supply will be measured will be based on the OAN as soon as this is known.

#### **Item 21: Deliverable Sites**

**Consultation Responses summary :** 8 respondents agreed or had no comments to make. 2 respondents disagreed.

One suggests that only sites with planning permission can be included in the 5 year supply, and points to the Inspector's decision letter in the recent Gladman appeal to support that. They indicate that sites with no formal status in emerging plans should not be included.

**Darlington Borough Council Response:** Neither the Inspector of the recent Gladman appeal nor NPPF/NPPG indicate that the Council cannot rely on sites without planning permission as contributing to the five year supply, but it is clear that the Council needs to be less optimistic about the delivery that could come from sites without planning permission. In many cases, the evidence that was presented reflected what the promoters of the site told the Council were their intentions. The Council will need to discuss how to moderate the industry's own forecasts to make the SHLAA more realistic.

**Change to Methodology:** Discuss with Steering Group how to moderate the industry's own forecasts on deliverability of sites without planning permission, to make the SHLAA more realistic.

#### **Item 22: What constitutes a developable site in the context of housing policy?**

**Consultation Responses summary:** 9 respondents agreed or made no comments. One respondent disagreed, saying that the Council should include sites as developable even if this takes the stock of developable sites well beyond the 6-15 year requirement.

**Darlington Borough Council Response:** Outside of land at the urban fringe and on the edge of the larger villages, there is no prospect of the land being in a suitable location for housing development at the point envisaged for sustainability reasons. To consider these in detail now is not resource efficient.

**Change to Methodology:** None.

#### **Item 23: UPDATING EVIDENCE ON THE 5 YEAR SUPPLY.**

**Consultation Responses summary:** 8 respondents either agreed, did not respond or had no comments to make. 2 respondents disagreed. Those disagreeing commented that the Council must consider its five year supply on the basis of its full OAN, apply 5% buffer and deal with under delivery and only include sites that are deliverable.

**Darlington Borough Council Response:** The approach suggested is what the Council will be doing, except for under delivery – an up to date OAN negates the need to consider previous under delivery, as any unmet needs arising from this will be picked up as outstanding needs in the OAN numbers for the coming years.

**Change to Methodology:** Once available, the Council will use the OAN to calculate its 5 years supply and apply a 5% buffer.



#### **Item 24: Dealing with past undersupply**

**Consultation Responses summary:** 7 respondents agreed or made no comments, 2 disagreed and one commented that the Council must ensure there is a 5 year supply of sites +5% buffer. Those disagreeing made the same comment that the 5 year supply should include addressing historic shortfall in the short term, and suggest the 5 year housing requirement is: OAN figure + past under-delivery + appropriate NPPF buffer.

**Darlington Borough Council Response:** The Council is commissioning work to prepare an up to date objective assessment of housing needs, using CLG household projection data to be published in late February 2015.

This will negate the need to consider previous under delivery as any unmet needs arising from this will be picked up as outstanding needs in the OAN numbers for the coming years.

Once the OAN is known, the Council will calculate its 5 years supply with a 5% buffer.

**Change to Methodology:** Once available, the Council will use the OAN to calculate its 5 years supply and apply a 5% buffer.

#### **Item 25: Dealing with housing for older people.**

**Consultation Responses summary:** 6 respondents agreed or had no comments to make. 2 disagreed and 2 made comments. Comments made were that any additional completions from this source should not be added retrospectively to previous years because they should only be counted if specific needs are identified in the OAN, and an appeal decision is provided to support this view. Also, that any proposed approach agreed should be set out clearly in the Local Plan and SHLAA methodology.

**Darlington Borough Council Response:** The information and evidence provided is noted and will be relayed to the Steering Group to inform its decision on the appropriate approach to this.

At this time, the Council is not clear on how the need for this accommodation could be identified and disaggregated from the overall housing needs work.

**Change to Methodology:** Clearly set out approach to counting C2 in SHLAA and local plan methodologies.

#### **Item 26: How should local planning authorities deal with student housing?**

**Consultation Responses summary:** 9 responses agreed or made no comments. One commented that whilst student housing is not a significant issue, the methodology should include some consideration of the amount of accommodation it releases in the market.

**Darlington Borough Council Response:** Student housing is not a significant issue- most of the students at college or University in Darlington are home based, split between those living in existing households within the Borough and those commuting in from households outside of the Borough.

**Change to Methodology:** None.

#### **Item 27: How should local planning authorities deal with empty housing and buildings?**

**Consultation Responses summary:** 9 responses agreed or made no comments. One suggested that the Council needs an empty homes strategy.

**Darlington Borough Council Response:** The Council has an empty homes strategy, [www.darlington.gov.uk](http://www.darlington.gov.uk), and is proactive in getting empty homes back into use. Where this happens, these are not counted as new dwellings, to avoid double counting.

**Change to Methodology:** No change.

#### **Item 28: Relationship of 5 year supply to neighbourhood planning**

**Consultation Responses summary:** 9 responses agreed or made no comments. One agreed with the suggestion to consult neighbourhood planning groups.

**Darlington Borough Council Response:** The Council has consulted neighbourhood planning groups to see if they have any sites to include for consideration in the SHLAA.

**Change to Methodology:** No change.

### **Item 29: Frequency of update**

**Consultation Response:** 9 responses agreed or made no comments. One responded that the SHLAA must be updated annually, not about annually.

**Darlington Borough Council Response:** The Council will aim to prepare the SHLAA update at least annually. The preparation of this SHLAA was delayed for pragmatic reasons – to await the outcome of the Gladman appeal, as this would inform the Council's SHLAA work going forward.

**Change to Methodology:** Revise methodology to indicate that the Council will aim to update the SHLAA annually.

### **Item 30: What information should be recorded when monitoring?**

**Consultation Response:** 8 respondents agreed or made no comments, two disagreed.

Both suggested that planning permission data is not collected and should be, and one asked the Council to review its whole approach to demonstrating 5 years land supply, in light of the Gladman appeal decision.

**Darlington Borough Council Response:** Data on sites with planning permission is collected and reported in the SHLAA – e.g. see Section 6 of Update 5. This methodology review is one part of the Council's process of reviewing its approach to demonstrating 5 years land supply. It is also commissioning work to establish the objectively assessed needs for the housing market area and to undertake a Strategic Housing Market Assessment to bring that data up to date.

**Change to Methodology:** As detailed above.

### **Other matters 1**

**Consultation Responses summary :** Barratt Homes asked what the Council's answers are to two questions posed in MPPG but not reflected in the consultation,

- Do local planning authorities have to meet in full housing needs identified in needs assessments?
- How is deliverability (1-5 years) and developability (6-15 years) determined in relation to housing supply?

#### **Darlington Borough Council Response**

At this time, the Council sees no reason why it would not seek to meet in full the housing needs identified in the needs assessment. Depending on how high they are, there may be question marks over the house building industry's appetite or capacity to deliver the required amount of new housing within the plan period.

The answer to Q2 is covered in the questions posed in the consultation and in the responses given above.

**Change to Methodology:** None.

### **Other matters 2**

**Consultation Responses summary:** NLP Planning disagree with the Council's approach to accord with PPG only where appropriate. PPG says that plan makers must set out reasons if they depart from the guidance. Do not consider local circumstances or 'where the overall aims of the SHLAA process will not be affected' to be reasons to deviate. The SHLAA will be more robust and less challengeable if the Council sticks to the PPG methodology

**Darlington Borough Council Response:** Disagree. The fact that the PPG says what LPAs should do if they do deviate indicates that there may be circumstances where this is appropriate. The circumstances cited seem reasonable. The Council has to balance according with PPG against the resources available to complete the task in a reasonable time.

**Change to Methodology:** None

### **Other matters 3**

**Consultation Response:** Gladman - Any departure from the explicit guidance provided by PPG needs to be set out and justified by the Council.

**Darlington Borough Council Response:** This is the Council's intention.

**Change to Methodology:** No change.

#### **Other matters 4**

**Consultation Response:** Gladman suggest that the SHLAA should be carried out once the OAN has been established. The Council needs to prepare its OAN and undertake a SHMA as soon as possible.

**Darlington Borough Council Response:** The Council accepts that the SHLAA cannot be completed until the OAN has been established, but wants to be in an advanced position to complete any final work required on the SHLAA as soon as the OAN is known.

It is currently commissioning work to understand its OAN, and expects the initial findings to be known in late Spring. The SHMA will be part of the same commission, but is expected to take longer to complete.

**Change to Methodology:** Need to extend timetable for preparation to extend beyond the OAN findings due date.

#### **Other matters 5**

**Consultation Response:** Gladman suggest that the Council should take account of the Gladman appeal Inspector's decision in respect of taking into account potential delays to housing delivery to provide infrastructure, and the potential legal challenges that may need to be overcome before unallocated sites are brought forward.

**Darlington Borough Council Response:** By working with the promoters of sites, the Council has first-hand information about the lead in times for major new developments being planned. All proposed housing sites attract objections, often vociferous local opposition. Provided that the Council has robust and transparent well evidenced reasons for the site allocations it is making, and it can accommodate some of the concerns people raise through setting out the planning requirements for each site, these should not generally be showstoppers.

**Change to Methodology:** None.

### **3. Conclusion**

3.1 The following provides a summary of differences between Darlington Borough Council's approach and NPPG / NPPF approach. Appendix 3 is relevant for this section.

- Darlington Borough is identified as the housing market area which is different to NPPG guidance which states it should be the housing market area and functional economic area.
- Through the SHLAA Steering Group, the process involves all NPPG suggested parties with exception to the local community, Parish Councils and neighbourhood forums. The LEP was invited but declined. Outside the Steering Group, neighbourhood planning groups were invited to submit sites.
- Darlington SHLAA assesses all sites of more than 5 dwellings or 0.17ha which varies marginally to the NPPG requirement of including all sites that can deliver 5 or more dwellings.
- In terms of site characteristics, Darlington's approach captures the majority of information indicated in the NPPG. The exception is that for sites with planning permission, Darlington only records that it has started and does not record numbers of units, plus there is no current recording of whether ground works are completed.
- NPPG states requirement to consider delivery record of developer and landowners. This is not currently considered as part of Darlington's approach but will be going forward.
- Detailed viability assessments of each site are not carried out as part of Darlington's SHLAA approach but more detailed site assessments will be published in the future.
- Action needed to remove constraints is identified and recorded but timing and likelihood of constraint being overcome will also be assessed to bring Darlington's approach directly in line with NPPG.
- NPPG requires an overall risk assessment to be made as to whether sites will come forward as anticipated in the trajectory, however Darlington does not currently undertake a risk assessment.
- Issues of undersupply are not currently addressed through Darlington's SHLAA as these are dealt with in housing technical papers associated with the preparation of the Making and Growing Places DPD.

- Darlington's SHLAA only counts self-contained C2 units which is different to NPPG guidance which sets out a requirement to count housing provided for older people, including residential institutions.
- Empty homes brought back into use are not counted in the Darlington SHLAA so as to avoid double counting.

3.2 Overall there is a limited range of differences between the NPPG guidance and Darlington's SHLAA approach.



## DARLINGTON SHLAA METHODOLOGY REVIEW CONSULTATION January 2014

### 1. INTRODUCTION

- 1.1 The Council's first SHLAA was published in March 2009. It was carried out according to a methodology that was agreed and finalised by a SHLAA Steering Group, following consultation with key stakeholders. The methodology and assumptions have been streamlined, clarified and updated in subsequent annual updates (the last published was Update 5 in January 2014), with the agreement of the Steering Group. The adopted method and assumptions delivered all the key outputs required by the Government's published guidance on SHLAAs at the time<sup>1</sup>. Over 125 sites have now been assessed through the SHLAA process.
- 1.2 Since the last SHLAA update, National Planning Practice Guidance (NPPG) has been issued. Amongst other things, it sets out guidance on how local planning authorities should undertake strategic housing land availability assessments (paragraphs 1 to 43 of the housing and economic development needs assessments section).
- 1.3 Prior to preparing Update 6, the Council is therefore consulting on proposals to revise the SHLAA methodology to ensure it reflects the latest Government guidance, where appropriate.
- 1.3 The Council's main aim is to ensure that its SHLAA process is a robust and locally appropriate one going forward. It is content to deviate from what NPPG says, where this can be justified by local circumstances and where it is not to the detriment of the aims of the process.

### 2. CONTENT OF THIS DOCUMENT

- 2.1 Appendix 1 of this document sets out in table form the stages, steps and issues identified in the NPPG for a SHLAA, and compares the current Darlington SHLAA approach with this. It then suggests whether or not and how the methodology should be changed. A summary of the proposed changes is set out in Table 2.1 below.

**Table 2.1: Proposed changes to SHLAA methodology**

| Item No. | Matter                            | Proposed Change                                                                                                       | Reason                                                                                                                                                                                                                                                                                                                            |
|----------|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2.       | Who should plan makers work with? | Reissue membership invite to a local property agent. Refresh house builder /RSL /landowner representatives if needed. | The SHLAA is a technical document, which tries to be as objective as possible. The subjective views of local people would adversely affect this. It is difficult to see how the involvement of businesses without a specific interest in house building would add to the process and the detailed technical nature of the work is |

<sup>1</sup> Strategic Housing Land Availability Assessments: Practice Guidance, CLG, 2007.

|     |                                                                                                          |                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                         |
|-----|----------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                                                                                          |                                                                                                                                                                                                                                                                                                | unlikely to be of interest to Tees Valley Unlimited.                                                                                                                                                                    |
| 4.  | How should sites be identified & data sources used to ascertain info?                                    | No change, except to also specifically ask community groups who are preparing neighbourhood plans.                                                                                                                                                                                             | The current approach is open and accessible to all, but the proposed change should ensure that the Council can support neighbourhoods better in any of their plan preparation in a structured way.                      |
| 9.  | What factors should be considered when assessing suitability?                                            | Give more explicit consideration as to whether sites could be suitable for self-build plots, e.g. these could be sites that are suitable and available, but for which no volume house builder is currently known to have an interest, and/or could be small infill sites.                      | To accord better with NPPG. Process as existing does not give the weight to self-build that recent Government promotion of this type of building suggests it should.                                                    |
| 10. | What factors should be considered when assessing availability?                                           | Research and note landowner/ developer record, and consider amending availability accordingly.                                                                                                                                                                                                 | To better reflect national guidance in NPPG.                                                                                                                                                                            |
| 12. | What happens when constraints are identified that impact on suitability, availability and achievability? | Add timing and likelihood of constraint being overcome.                                                                                                                                                                                                                                        | To add relevant information that can also assist review.                                                                                                                                                                |
| 15. | How should the assessment be reviewed?                                                                   | An appendix detailing the projected build out on all sites (i.e including ones with planning permission) will be added. Risk assessment text will be included in the analysis of the headline trajectory, to be agreed with the Steering Group. A risk rating could be proposed for each site. | To better accord with NPPG, and enable better understanding of the study findings.                                                                                                                                      |
| 18. | Core outputs                                                                                             | Add timing of when constraints could be overcome, by whom and a risk rating to each site in Table 4.1. See also proposals at 15 above.                                                                                                                                                         | For completeness and to get a summary of all information about potential sites in one place.                                                                                                                            |
| 19. | Determining deliverability and developability in relation to housing supply                              | Add in the NPPF definitions to appropriate point in text.                                                                                                                                                                                                                                      | To make basis for assessment explicit.                                                                                                                                                                                  |
| 20. | Starting point for 5 year supply.                                                                        | Depends on the outcome of the Gladman appeal referred to left.                                                                                                                                                                                                                                 | An objectively assessed needs exercise would be a separate technical exercise to the SHLAA, though the final figure from that work would provide the benchmark for the assessment of presence/absence of 5 year supply. |
| 24. | Dealing with past undersupply.                                                                           | Wait for outcome of Public Inquiry referred to 20. above to determine future approach. Cross reference to relevant                                                                                                                                                                             | To ensure co-ordination of related housing evidence documentation.                                                                                                                                                      |

|    |                                                         |                                                                                                                                                                                                                              |                                                                                                                                                                                               |
|----|---------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                         | sections of housing technical paper and its updates in the SHLAA.                                                                                                                                                            |                                                                                                                                                                                               |
| 25 | Dealing with housing for older people.                  | Research how many additional units would be provided by counting people living in C2 institutions. Report findings to the Steering Group, and agree approach for the counting these in housing figures so far in that forum. | Need to ascertain if this is a significant source of supply for the housing requirement or not, and if so, how this is retro-fitted into housing completions for past years already recorded. |
| 28 | Relationship of 5 year supply to neighbourhood planning | Seek suggestions for sites to be assessed from those preparing neighbourhood plans as per 4. above.                                                                                                                          | To provide neighbourhoods with the same level of information about sites they might want to consider as the Council has for sites potential site allocations in the local plan.               |

### 3. YOUR INPUT

- 3.1 The Council cannot prepare a useful and robust SHLAA without input from those with an interest in the development and use of land for new housing in the Borough. This methodology review consultation is your opportunity to shape the preparation of future SHLAA updates, and so help to ensure that there is robust and proportionate evidence of sufficient suitable, available and achievable land in the Borough to meet housing needs.
- 3.2 A separate questionnaire has been prepared to make it as easy as possible for you to respond. These and any other comments you may have on the SHLAA process should be completed and returned by e-mail to [planning.policy@darlington.gov.uk](mailto:planning.policy@darlington.gov.uk) or by post to:

Planning Policy  
Darlington Borough Council  
Town Hall  
Darlington, DL1 5BS

- 3.3 The closing date for receipt of comments and questionnaires is 3<sup>rd</sup> February 2015.

### 4. NEXT STEPS

- 4.1 A summary of the responses received will be prepared for and reported to the SHLAA Steering Group, following which any changes to the methodology will be agreed and implemented. This will be with immediate effect, to feed into the preparation of Update 6 of the SHLAA, which the Council intends to complete in early Spring 2015.

### 5. QUESTIONS, QUERIES AND FURTHER INFORMATION

- 5.1 All material relating to this consultation and previous SHLAAs can be found on the following page of the Council's website:

<http://www.darlington.gov.uk/environment-and-planning/planning/planning-and-environmental-policy/strategies,-projects-and-studies/shlaa/>

- 5.2 The methodology agreed in 2008 is in Appendix 2 of Update 5.
- 5.3 For any other questions or queries regarding this consultation, please contact Kieran Campbell via the [planning.policy@darlington.gov.uk](mailto:planning.policy@darlington.gov.uk), or telephone 01325 406292.

## SHLAA Update 6: Winter 2014/15

### Appendix 1: COMPARING NATIONAL GUIDANCE WITH EXISTING SHLAA APPROACH, RECOMMENDED CHANGES AND REASONS

| Item no. | Matter                                                                                  | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                                                                                                  | Existing Darlington SHLAA approach                                                                                                                                                                                                                                                                                                                                                                              | Proposed Approach                                                                                                                                                              | Reason                                                                                                                                                                                                                                                                                                                                                                                 |
|----------|-----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.       | Geographical area covered by the assessment.                                            | NPPG says that it should be the housing market area and functional economic area.<br><br>Revision date: 06 03 2014<br>Paragraph: 008 Reference ID: 3-007-20140306                                                                                                                                                                                                | Darlington Borough, as over 70% of all house moves were within the Borough,                                                                                                                                                                                                                                                                                                                                     | <ul style="list-style-type: none"> <li>No change this time.</li> </ul>                                                                                                         | Amendment this time would delay SHLAA work. May need to consider changing for Update 7, as latest Census data indicated that only 68.7% of all moves in Darlington were within the Borough, just below the self-containment threshold.                                                                                                                                                 |
| 2        | Who should plan makers work with?                                                       | NPPG suggests the process should involve developers; those with land interests; land promoters; local property agents; local communities; partner organisations; LEP's; businesses; parish and town councils; Neighborhood forums preparing Neighbourhood Plans.<br><br>Revision date: 06 03 2014<br>Paragraph: 009 Reference ID: 3-008-20140306                 | Steering Group currently comprises representatives of all groups indicated in NPPG, except local property agents, the local community, Parish Councils or neighbourhood forums, LEPs and businesses.                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>Reissue membership invite to a local property agent.</li> <li>Refresh house builder/RSL/landowner representatives if needed.</li> </ul> | The SHLAA is a technical document, which tries to be as objective as possible. The subjective views of local people would adversely affect this. It is difficult to see how the involvement of businesses without a specific interest in house building would add to the process and the detailed technical nature of the work is unlikely to be of interest to Tees Valley Unlimited. |
| 3        | Should the assessment be constrained, e.g. by site size or by the need for development? | NPPG says it should identify all sites and broad locations regardless of the amount of development needed.<br><br>Revision date: 06 03 2014<br>Paragraph: 010 Reference ID: 3-009-20140306<br><br>All sites that can deliver 5 or more dwellings should be considered. Plan makers can consider alternative site size thresholds.<br>(Para 011, 3-010-20140306 ) | All sites of more than 5 dwellings or 0.17ha or more are included in the assessment, even if there is known policy or other constraints.<br><br>More proactive and detailed information collection and updating is carried out on sites that best accord with the locational strategy, set out in Policy CS1 of the adopted LDF Core Strategy.<br>Different combinations of adjacent sites are also considered. | No change.                                                                                                                                                                     | It is in accord with the NPPG, and is as comprehensive and manageable as is possible with the resources available.<br>Sites below 6 dwellings/0.17ha are counted as windfalls. Their individual assessment would add little, but require significant additional work, delaying completion. The threshold is very similar to                                                            |



| Item no. | Matter                                                                | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                                                                                                                                                                                                            | Existing Darlington SHLAA approach                                                                                                                                                                                                                                                                                                                                                                                                                                         | Proposed Approach                                                                                  | Reason                                                                                                                                                                                             |
|----------|-----------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                    | that suggested in NPPG.                                                                                                                                                                            |
| 4        | How should sites be identified & data sources used to ascertain info? | <p>NPPG says by desk top review, including existing sites that can be improved, intensified or changed. It lists sources of data that may be relevant.</p> <p>Constraints should be clearly identified, and revisited to see if they can be overcome.</p> <p>Actively identify sites &amp; make a wide call for sites, setting out the key information required.</p> <p>Revision date: 06 03 2014<br/>Paragraph: 011, 012 , 013, reference ID 3-011, 012, 013-20140306</p> | <p>The Council is aware of all the sources of data listed in NPPG and draws on them as appropriate.</p> <p>Sites can be submitted for consideration in the SHLAA at any time, and a form is available permanently on the Council's website for this purpose.</p> <p>The Council also regularly reviews its own land, and identifies further sites for the SHLAA as a result of pre-application and other enquires received, and responses to local plan consultations.</p> | No change, except to also specifically ask community groups who are preparing neighbourhood plans. | The current approach is open and accessible to all, but the proposed change should ensure that the Council can support neighbourhoods better in any of their plan preparation in a structured way. |
| 5.       | Which sites should be included in the site survey?                    | <p>NPPG says the ones that have reasonable potential for development, taking account of national policies and designations.</p> <p>Revision date: 06 03 2014<br/>Paragraph: 014 Reference ID: 3-014-20140306</p>                                                                                                                                                                                                                                                           | <p>Site survey is carried out on all sites, but more proactive and detailed information collection and updating is carried out on sites that best accord with the locational strategy, set out in Policy CS1 of the adopted LDF Core Strategy.</p> <p>Monitoring information, a telephone survey and intelligence of the SHLAA Steering Group provide the up to date information on sites with planning permission.</p>                                                    | No change.                                                                                         | The Council's approach goes further than NPPF, and is tailored to the amount of development needed locally.                                                                                        |
| 6        | What characteristics should be recorded during the survey?            | <p>NPPG sets out a range of site characteristics that should be recorded.</p> <p>Paragraph: 016 Reference ID: 3-016-20140306<br/>Revision date: 06 03 2014</p>                                                                                                                                                                                                                                                                                                             | <p>The existing approach captures all the information indicated in NPPF, except that for sites with planning permission, it only records that a site has started, and not how many unit. We also do not record whether ground works are completed.</p>                                                                                                                                                                                                                     | No change.                                                                                         | The matters not collected are not considered vital to completion of a robust SHLAA.                                                                                                                |

| Item no. | Matter                                                                                                   | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                                                                            | Existing Darlington SHLAA approach                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Proposed Approach                                                                                                                                                                                                                                   | Reason                                                                                                                                                                                           |
|----------|----------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                                                                                          |                                                                                                                                                                                                                                                                                                                                            | The existing approach treats sites with planning permission differently to those without.                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                     |                                                                                                                                                                                                  |
| 7        | How should development potential be calculated?                                                          | <p>Locally determined policies, including density, taking into account site characteristics &amp; physical constraints. Assessing achievability (including viability) and suitability can usefully be carried out in parallel.</p> <p>Revision date: 06 03 2014<br/>Paragraph: 018 Reference ID: 3-017-20140306</p>                        | <p>Key local policy constraints are recorded for each site, referring to the adopted Core Strategy and other locally agreed documents, such as the Green Infrastructure Strategy.</p> <p>The Council's Design of New Development SPD, and any physical constraints are also identified for the site. The Council's Urban Design Officer sketches an indicative layout based on this to establish a realistic site capacity, which is considered and agreed (or not) by the SHLAA Steering Group, alongside their consideration of viability and policy constraints.</p> | No change.                                                                                                                                                                                                                                          | The approach used ensures all the factors to be taken into account in calculating development potential are given appropriate consideration, including the specific matters referred to in NPPG. |
| 8        | What factors should be considered for when and whether sites/broad locations are likely to be developed? | <p>Should assess the suitability, availability and achievability, including whether the site is economically viable.</p> <p>Revision date: 06 03 2014<br/>Paragraph: 018 Reference ID: 3-018-20140306</p>                                                                                                                                  | <p>Suitability, availability and achievability, including whether the site is economically viable, are all considered in the current approach, with information prepared and presented to the SHLAA Steering Group, who add to the information with their own market intelligence and site information.</p>                                                                                                                                                                                                                                                             | No change.                                                                                                                                                                                                                                          | Accords with NPPG.                                                                                                                                                                               |
| 9        | What factors should be considered when assessing suitability?                                            | <p>Should consider the types of development that may meet needs of community i.e. market housing, private rented affordable housing, self-build plots, and should be guided by local plan policies and how up to date they are, market requirements. Sites with planning permission are generally considered suitable for development,</p> | <p>SHLAA steering group meeting provides forum for different parts of the market to comment on whether sites are suitable for their markets, and for different types of development.</p> <p>Market requirements are accommodated as far as is</p>                                                                                                                                                                                                                                                                                                                       | <p>Give more explicit consideration as to whether sites could be suitable for self-build plots, e.g. these could be sites that are suitable and available, but for which no volume house builder is currently known to have an interest, and/or</p> | <p>To accord better with NPPG.</p> <p>Process as existing does not give the weight to self-build that recent Government promotion of this type of building suggests it should.</p>               |

| Item no. | Matter                                                                                                  | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                                                                                                                                             | Existing Darlington SHLAA approach                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Proposed Approach                                                                              | Reason                                                                                                |
|----------|---------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
|          |                                                                                                         | <p>unless circumstances have changed to alter that. Suitability considerations should also include physical constraints, potential impacts on the environment and to neighbours if development proceeded, likely market attractiveness, and contribution to regeneration priorities.</p> <p>Revision date: 06 03 2014<br/>Paragraph: 019 Reference ID: 3-019-20140306</p>                                   | <p>possible within the spatial framework set out in the adopted Core Strategy.</p> <p>All the factors identified in NPPG are considered in the existing process.</p>                                                                                                                                                                                                                                                                                                                                                                                                      | could be small infill sites.                                                                   |                                                                                                       |
| 10       | What factors should be considered when assessing availability?                                          | <p>Sites are considered available if there is confidence of no legal or ownership problems, generally with a landowner/developer who has expressed an intention to develop/sell. Consideration should be given to delivery record, e.g. unimplemented permissions, of developers and landowners putting forward sites.</p> <p>Revision date: 06 03 2014<br/>Paragraph: 020 Reference ID: 3-020-20140306</p> | <p>Gather information from landowner/promoter of site &amp; establish land ownership &amp; carry out legal and land searches to establish situation, if any doubt.</p> <p>Delivery record of developer/landowner not currently considered.</p>                                                                                                                                                                                                                                                                                                                            | Research and note landowner/ developer record, and consider amending availability accordingly. | To better reflect national guidance in NPPG.                                                          |
| 11       | What factors should be considered when assessing achievability Including whether development is viable? | <p>NPPG reiterates NPPF regarding achievability. It suggests economic viability and the capacity of the developer to complete and let/sell the development over a certain period are key factors.<br/>(Para 21, 3-021-20140306)</p>                                                                                                                                                                         | <p>Detailed viability assessments of each site are not carried out, as this would be resource prohibitive. Instead, the local market knowledge of the SHLAA Steering Group is tapped to make this assessment, alongside information about whether sites are in high or low value parts of the Borough, and whether sites, such as Council owned land, could come forward at less than full market value.</p> <p>Capacity of developers to complete is determined by the Steering Group with reference to past annual build out rates on large and small sites and any</p> | No change.                                                                                     | Resource constraints on doing anything more detailed and doing so may not provide any better answers. |

| Item no. | Matter                                                                                                   | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                        | Existing Darlington SHLAA approach                                                                                                                                                                                                                                                                         | Proposed Approach                                                                                                                                                                                                                                                                              | Reason                                                                                              |
|----------|----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
|          |                                                                                                          |                                                                                                                                                                                                                                                                                        | economic factors that may mean this could be different going forward.                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                |                                                                                                     |
| 12       | What happens when constraints are identified that impact on suitability, availability and achievability? | NPPG suggests considering the action needed to remove constraints, and when, how, and likelihood of this being achieved.<br>(Para 22, 3-022-20140306)<br>Revision date: 06 03 2014                                                                                                     | Action needed is identified and recorded.                                                                                                                                                                                                                                                                  | Add timing and likelihood of constraint being overcome.                                                                                                                                                                                                                                        | To add relevant information that can also assist review.                                            |
| 13       | How should timescale & rate of development be assessed & presented?                                      | Indicative lead in times & build out rates for different scale & types of site. Allow for more than one developer on large sites. Draw on advice of developers and local agents to assess lead in times and build out rates.<br>(Para 23, 3-023-20140306)<br>Revision date: 06 03 2014 | Telephone survey establishes build out rates and lead in times on small and larger sites, where possible. Generic assumptions agreed with Steering Group applied to those for which specific information is not available. Deadlines for spending funding on RSL schemes is also taken into consideration. | No change.                                                                                                                                                                                                                                                                                     | Existing approach considered to be more thorough than NPPG.                                         |
| 14       | Determining windfall allowance.                                                                          | Compelling evidence required if windfall allowance is included in 5 year supply. LPA's can identify windfalls from broad locations for years 6-15.<br>(Para 24, 3-024-20140306)<br>Revision date: 06 03 2014                                                                           | The Council reports a time series of past windfall data back to 2006 (excluding garden land) to justify its proposed windfall allowance to the SHLAA Steering Group.                                                                                                                                       | No change.                                                                                                                                                                                                                                                                                     | Time series of evidence is regarded as meeting the 'compelling' standard set by NPPF.               |
| 15       | How should the assessment be reviewed?                                                                   | The development potential of all sites can be collected to produce an indicative trajectory. An overall risk assessment should be made as to whether sites will come forward as anticipated.<br><br>(Para 25, 3-025-20140306)<br>Revision date: 06 03 2014                             | The headline figures for all sources of supply are recorded for each year in tables in the SHLAA, and the projected first 5 years delivery is set out for sites without planning permission. No risk assessment is explicitly included.                                                                    | An appendix detailing the projected build out on all sites (i.e including ones with planning permission) will be added. Risk assessment text will be included in the analysis of the headline trajectory, to be agreed with the Steering Group. A risk rating could be proposed for each site. | To better accord with NPPG, and enable better understanding of the study findings.                  |
| 16       | What if the trajectory indicates there is not enough                                                     | The assessment should be revisited to see if any assumptions could be changed to release more supply. If not, consideration will need to be given to                                                                                                                                   | This circumstance has not arisen previously. The SHLAA Steering group would be recalled if there was a shortfall, to consider the                                                                                                                                                                          | If insufficient land can be identified by the approach outlined left, the Council will need to revisit its planning                                                                                                                                                                            | Whether or not there is sufficient land to meet objectively assessed needs can depend on the amount |

| Item no. | Matter                                                                                                                                             | What the NPPF/ NPPG says, (including reference)                                                                                                                                                           | Existing Darlington SHLAA approach                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Proposed Approach                                                                                                                                                                      | Reason                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | supply to meet the objectively assessed need? If more land is needed, what is the balance between housing need and constraints on the use of land. | how this shortfall should be best planned for.<br><br>(Para 26, 3-026-20140306, and Para 44, 3-044-20140306, and Para 45, 3-045-20140306)<br>Revision dates: 06 03 2014 (26) and 06 10 2014(44 and 45)    | evidence further, and further investigations would be made into whether Council owned land could be released earlier, and whether there was any flexibility in the policy constraints identified, taking into account the policies of the NPPF considered as a whole.                                                                                                                                                                                                                                                 | policy and evidence base. The SHLAA would be completed and signed off indicating that this further action was needed, and would set out a timetable for the completion of that action. | of deliverable housing and the level of the objectively assessed need (OAN), both of which can change over time.<br>The identification of new sites and agreeing an OAN are both plan making activities, and not beyond the scope of the technical SHLAA exercise. The Council would seek to meet its OAN in full, subject to any constraints that may restrict development or restraint the ability of the authority to meet its need. The OAN is a separate, albeit related exercise. |
| 17       | Identifying sites or broad locations beyond 5 years.                                                                                               | This should be done for years 6-15 where possible. Plans can still be found sound if LPAs have not been able to identify these for years 11-15.<br>(Para 27, 3-027-20140306)<br>Revision date: 06 03 2014 | Specific sites are identified up to 2026.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | No change, though this will need to be reviewed in 2016.                                                                                                                               | Meets the NPPG in full.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 18.      | Core outputs                                                                                                                                       | Sets out a list of standard outputs that should be available in a publicly accessible form.<br>(Para 28, 3-028-20140306)<br>Revision date: 06 03 2014                                                     | All sites (except small sites with Planning permission) are listed and identified on maps. A summary of the assessment of each site (except small sites with planning permission), and whether and when it can be realistically developed is included. More detail is included for sites that are more realistic candidates for development. Reasons for discounting others are given. For sites without planning permission, the potential type and quantity, estimated build out rates and how and when constraints | Add timing of when constraints could be overcome, by whom and a risk rating to each site in Table 4.1.<br>See also proposals at 15 above.                                              | For completeness and to get a summary of all information about potential sites in one place.                                                                                                                                                                                                                                                                                                                                                                                            |

| Item no. | Matter                                                                      | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Existing Darlington SHLAA approach                                                                                                                                                                                                                                                                                                                              | Proposed Approach                                              | Reason                                                                                                                                                                                                                  |
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|          |                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>can be overcome is set out in a single table.</p> <p>An indicative trajectory on a site by site basis is only provided for sites without planning permission.</p> <p>The final SHLAA is published on the Council's website, as soon as possible after its completion.</p>                                                                                    |                                                                |                                                                                                                                                                                                                         |
| 19       | Determining deliverability and developability in relation to housing supply | <p>Need to determine in accordance with the definitions in footnote 11 and 12 of NPPF.</p> <p>(Para 29, 3-029-20140306)</p> <p>Revision date: 06 03 2014</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | NPPF footnotes are applied to determine this, but may need to say this explicitly in the document/methodology.                                                                                                                                                                                                                                                  | Add in the NPPF definitions to appropriate point in text.      | To make basis for assessment explicit.                                                                                                                                                                                  |
| 20.      | Starting point for 5 year supply.                                           | <p>Housing requirements in an up to date adopted local plan should be used as the starting point for calculating 5 year supply. Such plans should be given considerable weight unless new evidence has come to light. Evidence that is drawn from revoked regional strategies may not adequately reflect current needs. If local plan figures are not appropriate to use, information in the latest full assessments of housing needs should be considered.</p> <p>Where there is no robust recent assessment, CLG household projections should be used, but the weight given to these should take account of the fact they have not been tested.</p> <p>(Para 30, 3-030-20140306)</p> <p>Revision date: 06 03 2014</p> | <p>Since 2011, the updates to the SHLAA have relied on the Core Strategy housing requirement to assess the 5 year land supply position.</p> <p>The Inspectors report into the appeal by Public Inquiry of Gladman homes against the Council's decision to refuse its application for 250 dwellings at Middleton St. George may give cause to consider this.</p> | Depends on the outcome of the Gladman appeal referred to left. | An objectively assessed needs exercise would be a separate technical exercise to the SHLAA, though the final figure from that work would provide the benchmark for the assessment of presence/absence of 5 year supply. |
| 21       | What constitutes a deliverable site in the context of housing policy?       | <p>Can include sites allocated in an adopted plan and sites with planning permission, unless clear evidence sites will not come forward.</p> <p>Sites without planning permission can be included if there is deliverability</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Where possible, information is obtained direct from developers and landowners for small and large sites to ascertain delivery prospects for allocated sites and sites with planning permission.                                                                                                                                                                 | No change.                                                     | Approach in accord with NPPG and is appropriate for local needs.                                                                                                                                                        |

| Item no. | Matter                                                                | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                                                                                                                                                                                       | Existing Darlington SHLAA approach                                                                                                                                                                                                                                                                                                                             | Proposed Approach                                                                                                                                                                       | Reason                                                                                          |
|----------|-----------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
|          |                                                                       | evidence, and no infrastructure constraints.<br>Evidence/method needs to be robust and transparent.<br><br>(Para 31, 3-031-20140306)<br>Revision date: 06 03 2014                                                                                                                                                                                                                                                                                     | The current approach also includes sites without planning permission where there is evidence of deliverability, and no infrastructure constraints, and takes account of lead in times for larger sites.<br>A review with SHLAA Steering Group is carried out, to examine the assumptions used about lead in times for developing out different sizes of sites. |                                                                                                                                                                                         |                                                                                                 |
| 22       | What constitutes a developable site in the context of housing policy? | There should be a reasonable prospect that it will be available and could be viably developed at the point envisaged in years 6-15.<br><br>Para 32, 3-032-20140306)<br>Revision date: 06 03 2014                                                                                                                                                                                                                                                      | Evidence collected on each site is presented to the SHLAA Steering Group which considers it and agrees/amends the Council's draft conclusions, using their local market knowledge and intelligence.                                                                                                                                                            | No change.                                                                                                                                                                              | Approach in accord with NPPG and is appropriate for local needs.                                |
| 23       | Updating evidence on the 5 year supply.                               | LPAs must identify and update the 5 year land supply each year, considering delivery against the forecast trajectory and the deliverability of all sites identified.<br>An annual thorough approach provides a strong position to demonstrate 5 year supply.<br>Para 33, 3-033-20140306)<br>Revision date: 06 03 2014                                                                                                                                 | The Council does this and includes any new sites identified by itself and others on an annual basis                                                                                                                                                                                                                                                            | No change.                                                                                                                                                                              | Approach in accords with and exceeds that suggested in NPPG and is appropriate for local needs. |
| 24       | Dealing with past undersupply.                                        | Whether there has been persistent under delivery is a matter of judgement, there is no 'universally applicable test' to quantify it, and the issues are likely to be locally unique. Analysis of delivery record is likely to be more robust if a longer view is taken, to take account of peaks and troughs in the housing market. A LPA should aim to deal with any undersupply within the first 5 years of the plan period where possible. If not, | The SHLAA currently doesn't cover these matters. They are dealt with in housing technical papers associated with the preparation of the Making and Growing Places DPD.                                                                                                                                                                                         | Wait for outcome of Public Inquiry referred to 20. above to determine future approach.<br>Cross reference to relevant sections of housing technical paper and its updates in the SHLAA. | To ensure co-ordination of related housing evidence documentation.                              |

| Item no. | Matter                                                                       | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                                                                                                 | Existing Darlington SHLAA approach                                                                                                                                                                                                                                            | Proposed Approach                                                                                                                                                                                | Reason                                                                                                                                                                                                                                   |
|----------|------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                                                              | it should work with neighbouring authorities under 'duty to cooperate'.<br>Para 35, 3-035-20140306)<br>Revision date: 06 03 2014                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 25       | Dealing with housing for older people.                                       | Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement.<br><br>(Revision date: 06 03 2014<br>Paragraph: 037 Reference ID: 3-037-20140306)                                                                                                             | Only self-contained C2 units have been counted to date.                                                                                                                                                                                                                       | Research how many additional units would be counted using this method. Report findings to the Steering Group, and agree approach for the counting these in housing figures so far in that forum. | Need to ascertain if this is a significant source of supply for the housing requirement or not, and if so, how this is retro-fitted into housing completions for past years already recorded.                                            |
| 26       | How should local planning authorities deal with student housing?             | All types of student accommodation can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market.<br>(Revision date: 06 03 2014<br>Paragraph: 038 Reference ID: 3-038-20140306)                                                                                                                       | None.                                                                                                                                                                                                                                                                         | No change.                                                                                                                                                                                       | Student housing is not a significant issue in Darlington Borough; students at the University and college tend to live locally or within travelling distance.                                                                             |
| 27       | How should local planning authorities deal with empty housing and buildings? | Any approach to bringing empty homes back into use and counting these against housing need would have to be robustly evidenced by LPA at the independent examination of the draft Local Plan, for example to test the deliverability of the strategy and to avoid double counting.<br>Paragraph: 039 Reference ID: 3-039-20140306)<br>Revision date: 06 03 2014 | Empty homes brought back into use are not counted in the SHLAA, to avoid double counting. The same applies to conversion of other buildings to residential use, which is picked up when prior approvals/planning permission is granted, or as potential sites for assessment. | No change.                                                                                                                                                                                       | Accords with national guidance. Whilst the Council has a programme to actively support bringing empty homes back into use supply of new homes from this source is limited in the context of the overall numbers considered in the SHLAA. |
| 28       | Relationship of 5 year supply to neighbourhood planning                      | The LPA should share evidence used to prepare the local plan, such as the SHLAA. Neighbourhood plans should deliver against objectively assessed needs.<br>Paragraph: 040 Reference ID: 3-040-20140306)<br>Revision date: 06 03 2014                                                                                                                            | The SHLAA evidence is publicly available via the Council's website, and outside of the SHLAA process, communities considering NPs are signposted to it.                                                                                                                       | Seek suggestions for sites to be assessed from those preparing neighbourhood plans as per 4. above.                                                                                              | To provide neighbourhoods with the same level of information about sites they might want to consider as the Council has for sites potential site allocations in the local plan.                                                          |
| 29       | Frequency of update                                                          | Should be annually. Full resurvey only needed if new development plan is being prepared or circumstances change significantly.                                                                                                                                                                                                                                  | The SHLAA is updated about annually.                                                                                                                                                                                                                                          | No change.                                                                                                                                                                                       | Complies with NPPG.                                                                                                                                                                                                                      |



| Item no. | Matter                                               | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Existing Darlington SHLAA approach                                                                                                                                                   | Proposed Approach | Reason                                                                                                                                                              |
|----------|------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                                      | Paragraph: 041 Reference ID: 3-041-20140306)<br>Revision date: 06 03 2014                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                      |                   |                                                                                                                                                                     |
| 30       | What information should be recorded when monitoring? | <p>The NPPG indicates 5 main things to record:</p> <ol style="list-style-type: none"> <li>1. progress on allocated and sites with planning permission;</li> <li>2. which SHLAA sites/locations now have planning applications/permissions</li> <li>3. progress on removing constraints on development and changes to deliverability/ developability;</li> <li>4. unforeseen constraints that have emerged, and how they could be addressed;</li> <li>5. Whether the windfall allowances (where justified) is coming forward as expected, or may need to be adjusted.</li> </ol> <p>Paragraph: 041 Reference ID: 3-041-20140306)<br/>Revision date: 06 03 2014</p> | <p>The existing approach encompasses all the matters identified in NPPG.</p> <p>This information is all captured and reported in the SHLAA. See 14. above for windfall approach.</p> | No change.        | <p>The approach accords with NPPG and allows appropriate consideration to be given to these factors. Use of the Steering Group provides a useful reality check.</p> |

| Agent/Developer                                       | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | DBC Officer Comments                                                                                  | Change to methodology |
|-------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|-----------------------|
| Item 1 - Geographical area covered by the assessment. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                       |                       |
| Prism Planning                                        | Agree - acknowledging time constraints, but the lack of conformity with government guidance needs to be fully acknowledged.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | The text in the SHLAA report on the scope of the assessment will acknowledge the deviation from NPPG. | None.                 |
| Taylor Wimpey                                         | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                       |                       |
| St Modwen Developments                                | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                       |                       |
| Hartlepool Borough Council                            | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                       |                       |
| Barratt Homes                                         | Agree - The last SHLAA, 2013 states that ‘The Tees Valley Strategic Housing Market Assessment found that Darlington, as well as having its own housing market in the urban area, is part of another wider market area including other parts of the Tees Valley City Region (including parts of County Durham and North Yorkshire)’.<br>Using Darlington Borough for the assessment seems appropriate. Indeed using the Borough is given further weighting by the Inspector’s conclusion in the appeal decision at land off Sadberge Road, Middleton St George, Darlington, County Durham, DL2 1JT (APP/N1350/A/14/2217552). The Inspector acknowledged that Darlington Borough is the major part of an HMA that probably extends into adjacent parts of North Yorkshire and County Durham, but that given ‘a high proportion of the population live within the Borough ... it is reasonable to base any assessment of housing need on the population of the Borough’.<br>BDW agree with the decision to continue using Darlington Borough as the Housing Market Area. |                                                                                                       |                       |
| NLP Planning                                          | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                       |                       |
| Gladman                                               | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                       |                       |
| Cussins                                               | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                       |                       |
| Stockton BC                                           | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                       |                       |
| Bussey & Armstrong Ltd                                | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                       |                       |
|                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                       |                       |
| Item 2 - Who should plan makers work with?            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                       |                       |

| Agent/Developer            | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                              | Change to methodology                                                                                                              |
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| Prism Planning             | Agree – however will this lead to delay and if so how does this square with the Council's stance taken on item 1?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 8 out of 10 respondents agreed with the Council's proposals to reissue membership invite to a local property agent, and to refresh house builder/ RSL/ landowner representatives if needed.<br>3 respondents felt it was important to involve the LEP and local businesses. One felt that this could highlight new opportunities for housing.                                                                                                     | Refresh Steering Group as necessary to ensure membership includes parties that are prepared to fully engage.                       |
| Taylor Wimpey              | Agree - TWUK consider it important that the SHLAA Steering Group includes a broad range of professional involved in the housing market so that there can be broad input on the discussions. The Council should therefore seek to engage as many of the groups identified in NPPG to be part of the Steering Group particularly local agents who will have a wider understanding of how the housing market in the Borough operates.<br>The LEP and local businesses should at least be given the opportunity to attend and it should not be up to the Council to pre-determine whether these groups have an interest in the delivery of housing. | 2 respondents felt that Parish Councils, neighbourhood forums should also be involved, because they can boost the Council's knowledge and understanding when allocating sites.<br>1 volume house builder asked to be added to the Steering Group, and asked for the group to refresh the representatives.<br>One respondent questioned if all this additional involvement would lead to delay and need extra resources that may not be available. | Include a local property agent and local business interest in the Group membership.<br><br>Issue invite to attend to TVU, the LEP. |
| St Modwen Developments     | Agree- It is important that the SHLAA Steering Group includes a broad range of professionals involved in the housing market so that there can be broad input on the discussions. The Council should therefore seek to engage as many of the groups identified in NPPG to be part of the Steering Group particularly local agents who will have a wider understanding of how the housing market in the Borough operates.<br><br>The LEP and local businesses should at least be given the opportunity to attend and it should not be up to the Council to pre-determine whether these groups have an interest in delivery of housing.            | 1 respondent suggested that he Council involve other Local Planning Authorities to determine the approach they are taking as part of their SHLAA preparation and to be aware of any shortfall positions in neighbouring authorities.                                                                                                                                                                                                              | Invite those preparing neighbourhood plans (Middleton St. George and Blackwell) to submit potential sites.                         |
| Hartlepool Borough Council | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                    |
| Barratt Homes              | We recognise that the Council acknowledge that some groups are not currently represented in the steering group, namely local property agents, the local community, Parish Councils or neighbourhood forums, LEPs and businesses.<br><br>The current composition of the Darlington SHLAA Steering Group demonstrates the need for these groups to be included. At the                                                                                                                                                                                                                                                                            | 1 respondent suggested it is crucial to engage with the NPPG                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                    |

| Agent/Developer | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Change to methodology |
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|                 | <p>moment the group consists predominately of house builders.</p> <p>BDW support the council's commitment to reissue a membership invite to a local property agent and to refresh house builder/RSL/Landowner representatives. The Council state they will refresh the later if needed. We would urge the council to definitely refresh this. BDW would be keen to join the steering group.</p> <p>To conform with NPPG, the Council should also involve Parish Councils, neighbourhood forums preparing Neighbourhood Plans, LEPs and businesses. NPPG states that all of these groups should be involved from the earliest stage.</p> <p>BDW acknowledge the Council's consideration of local people and businesses, but object with their decision that they would adversely affect the SHLAA process. We fully disagree, it is important to involve local communities to boost the council's local knowledge and understanding when allocating sites and ensure the creation of a transparent planning system, open to all. It is crucial to involve businesses so the council can determine their future plans and plans for the site of the business, the idea that it might open up greater opportunities for housing sites cannot be overlooked. It is essential to involve both parties to get support for housing sites – housing and economic growth are intrinsically linked.</p> <p>Although the Housing Market Area has been determined as Darlington Borough, we would like to see Darlington involve other Local Planning Authorities to determine the approach they are taking as part of their SHLAA preparation and be aware of any shortfall positions in neighbouring authorities.</p> <p>Once the Council secures a more inclusive steering group membership, the Council must ensure it fully engages with them. The Inspector concluded in the Middleton St George appeal decision that the 2011 SHLAA analysis was prepared in full consultation with the development industry. However, he noted that they were far less, if at all, involved with more recent analysis. He stated that the steering group have not approved revised figures and not consulted about additional sites.</p> <p>BDW would urge the council to refresh house</p> | <p>groups and especially the LEP.</p> <p><b>Response</b><br/> An invitation to the Steering Group has been issued to the LEP, but it has been declined. An invitation to join the Group has been accepted by Julie Wallin and Nick Carver of Carver Commercial as a local agent and local business representative.<br/> All the above can be achieved within the timetable set out.</p> <p>The Steering Group already has two general volume house builder representatives selected by the regional HBF, and one respondent felt that it was already predominantly house builders, so the request from BDW to join is politely declined. Inquiries have been made of the HBF whether they want to change their representation on the Group but no reply has been received prior to agenda paper dispatch.<br/> Regarding involving community groups, the neighbourhood forum groups have been asked if there are any sites they want including, but neither has come up with any.</p> <p>The issue of housing provision shortfalls in adjacent authorities is a matter for other planning policy plan making work under the Duty to Co-operate, not specifically the</p> |                       |

| Agent/Developer                                                                                  | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                   | Change to methodology |
|--------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
|                                                                                                  | builder/RSL/landowner representatives, involve Parish Councils, Neighbourhood Forums, LEPs, businesses and local communities and ensure they involve neighbouring Local Planning Authorities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | SHLAA.<br><br>he Steering Group will be fully involved in preparing this SHLAA update, through this consultation, the Steering Group meeting and commenting on a draft SHLAA report in due course.<br><br>The Inspector references alluded to were to update work done by the Council specifically for that Public Inquiry following the same methodology and assumptions used in the last update (5). |                       |
| NLP Planning                                                                                     | Agree – welcome the approach of inviting local property agents and refresh house builder and landowner representatives.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                        |                       |
| Gladman                                                                                          | The Council propose to reissue membership to a variety of bodies (local property agents, RSL and landowner representatives) but are not involving local businesses/LEP. The Council should proactively engage with all representatives identified under paragraph 8 of PPG (ref ID: 3-008) ‘Who should plan makers work with.’ Housing and economic development are inter-related issues, Gladman consider that the Tees Valley Unlimited LEP should not be discounted as part of the representatives the Council should engage with. The LEP aims to create an additional 25,000 jobs by 2025, therefore it is crucial that the Council engage with the LEP to ensure that there is a sufficient level of housing that will support the increase in future jobs within the Borough. |                                                                                                                                                                                                                                                                                                                                                                                                        |                       |
| Cussins                                                                                          | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                        |                       |
| Stockton BC                                                                                      | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                        |                       |
| Bussey & Armstrong Ltd                                                                           | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                        |                       |
| Item 3 - Should the assessment be constrained, e.g. by site size or by the need for development? |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                        |                       |
| Prism Planning                                                                                   | Agree- no comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | All respondents either agreed or had no comments.                                                                                                                                                                                                                                                                                                                                                      | None.                 |
| Taylor Wimpey                                                                                    | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                        |                       |
| St Modwen Developments                                                                           | Agree - no comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                        |                       |
| Hartlepool Borough Council                                                                       | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                        |                       |
| Barratt Homes                                                                                    | Agree - BDW agree with the existing approach being used by the Council to include all sites of more than 5 dwellings or 0.17ha or more are included in the assessment, even if there is known policy or other constraints. The approach is in accordance with the NPPG.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                        |                       |
| NLP                                                                                              | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                        |                       |
| Gladman                                                                                          | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                        |                       |
| Cussins                                                                                          | Agree- no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                        |                       |
| Stockton BC                                                                                      | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                        |                       |
| Bussey & Armstrong Ltd                                                                           | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                        |                       |
| Item 4 - How should sites be identified & data sources used to ascertain info?                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                        |                       |

| Agent/Developer                                                    | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Change to methodology                                                                                                                                                                                      |
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| Prism Planning                                                     | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>All respondents agreed, one suggesting an addition to the methodology note to indicate that the Council actively seeks to identify sites that might be suitable for development in its desk top review. The same respondent suggests that the Council should make it clear where the site information comes from that informs their allocations, and get a robust site allocations strategy in place, and presses for more community group involvement in the process.</p> <p><b>Response</b><br/>Where the Council has information that is not given confidentially regarding potential development sites, it adds these to the SHLAA process. It also reviews the development potential of its own landholdings on a regular basis.</p> <p>Identifying the source of site information is already done through the background papers that underpin local plan preparation. The Core Strategy (CS1 and CS10) is where the site allocations strategy is set out –see <a href="http://www.darlington.gov.uk/mgp">www.darlington.gov.uk/mgp</a></p> <p>Involvement of community groups is dealt with under Item 2 above.</p> | <p>Add statement to methodology note to record that the Council actively identifies sites through the desktop review process that may have a part to play in meeting the development needs of an area.</p> |
| Taylor Wimpey                                                      | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                            |
| St Modwen Developments                                             | Agree- no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                            |
| Hartlepool Borough Council                                         | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                            |
| Barratt Homes                                                      | <p>BDW agree that no change is needed to the existing Darlington SHLAA approach. We note that the Council has only proposed one change - to ask community groups who are preparing neighbourhood plans. We agree with this and reiterates our commitment to including Parish Councils or neighbourhood forums involved in preparing Neighbourhood Plans in the steering group.</p> <p>The Council should also make clear in their methodology that they actively identify sites through the desktop review process that may have a part to play in meeting the development needs of an area.</p> <p>In the Middleton St George appeal decision the Inspector commented on the council's lack of a site allocations plan strategy. We would urge the council to develop a robust site allocations plan strategy, showing how they identify sites and which data sources they use to ascertain information.</p> <p>BDW agrees that no change is needed to the existing SHLAA approach, with the exception of the involvement of community groups preparing neighbourhood plans and stating in the methodology that they actively identify sites through the desktop review process.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                            |
| NLP                                                                | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                            |
| Gladman                                                            | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                            |
| Cussins                                                            | Agree -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                            |
| Stockton BC                                                        | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                            |
| Bussey & Armstrong Ltd                                             | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                            |
| <b>Item 5 - Which sites should be included in the site survey?</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                            |
| Prism Planning                                                     | Disagree - The Council's approach is contrary to NPPG advice and moves on a step from what a SHLAA should consider. It is not for the SHLAA to take into account planning policy (the Council's locational strategy); it is for planning policy documents to take                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>6 out of 10 respondents agreed or had no comments on the proposed approach.</p> <p>Other respondents suggested the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                            |

| Agent/Developer            | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Change to methodology |
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|                            | SHLAA findings into account. The SHLAA should consider all sites that are considered to be developable, deliverable and achievable. Those not considered to be in sustainable locations can be filtered out later.                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>approach should not use the Council's locational strategy in the LDF in any way to guide the work, and that all sites should therefore be assessed on the basis of the same level of information.</p> <p>Two respondents suggested only national policies and designations should be considered, but another asked that these also be considered, and the fact be reported if it is already done.</p> <p>One respondent suggested that as the locational strategy is out of date, in accordance with the PPG, site surveys should be proportionate to the detail required for a robust appraisal, and more detailed where sites are considered to be realistic candidates for development. Any site that meets national policy requirements is a realistic candidate at the moment.</p> <p><b>Response:</b><br/>Until the OAN is known (which could be in early June 2015), and the extent of any shortfall in the 5 years land supply against that shortfall, it could potentially be a waste of significant resources to underpin the assessments of all sites with the same information. Fuller evidence for sites given a 'light touch' under the current process (e.g. sites in the open countryside unrelated to existing settlements) could readily be collected, if and when the need to identify more sites arises. The Group would be reconvened to consider</p> |                       |
| Taylor Wimpey              | Disagree - Given the conclusions of the Gladman appeal at Middleton St George, the housing requirement and locational strategy are, as a matter of fact out of date. The locational strategy should therefore not be used as a basis to prepare more detailed assessments on some sites.<br>Each site should be considered equally and a full assessment undertaken taking into consideration only national policies and designations as stated in NPPG.<br>Applying the outdated locational strategy results in potentially deliverable sites (in accordance with the requirements of NPPF) not being fully considered and identified.                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                       |
| St Modwen Developments     | Disagree - Given the conclusions of the Gladman appeal, the housing requirement and locational strategy are out of date. The locational strategy should therefore not be used as a basis to prepare more detailed assessments on some sites.<br>Each site should be considered equally and a full assessment undertaken taking into account only national policies and designations as stated in NPPG.<br>Applying the outdated locational strategy results in potentially deliverable sites (in accordance with the requirements of NPPF) not being fully considered and identified.                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                       |
| Hartlepool Borough Council | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                       |
| Barratt Homes              | The Council currently conduct site surveys on all sites, but more proactive and detailed information collection and updating is carried out on sites that best accord with the locational strategy, set out in Policy CS1 of the adopted LDF Core Strategy. Monitoring information, a telephone survey and intelligence of the SHLAA steering group provide the up to date information on sites with planning permission. Consideration must be given to the fact that the Core Strategy precedes the NPPF.<br>BDW agree with this approach. But would urge the Council to take account of national policies and designations or to state this in their methodology, if this is done already. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                       |
| NLP                        | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                       |
| Gladman                    | Gladman object to the approach taken by item 5 which seeks to progress with its current strategy, which goes beyond the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                       |



| Agent/Developer                                                            | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                        | Change to methodology                                                                                                                                                                                                                 |
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|                                                                            | <p>requirements of the Framework and PPG. The existing SHLAA methodology seeks to carry out a more detailed assessment with sites which accord to the locational strategy set out in Policy CS1 of the adopted Core Strategy. The Inspector decided in the recent planning appeal at Middleton St. George that the development plan policies which regulate the supply and location of housing within the Borough are now time expired and/or out of date (Appendix 1: page 3, paragraph 13).</p> <p>Gladman contend that all sites should be assessed on a comparable basis by a robust survey and not sites that accord with a pre-Framework spatial strategy. The survey should be in accordance with PPG, which states 'site surveys should be proportionate to the detail required for a robust appraisal. For example, the assessment will need to be more detailed where sites are considered to be realistic candidates for development.'</p> <p>A strategy which seeks to preserve Policy CS1 and LP Policies E2 and H7 is inconsistent with the Framework as they are now out of date/time expired. This approach would preclude the ability of otherwise sustainable sites which meet the requirements of national policy being considered by a robust assessment.</p> | <p>this, if so.</p>                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                       |
| Cussins                                                                    | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                       |
| Stockton BC                                                                | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                       |
| Bussey & Armstrong Ltd                                                     | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                       |
| <b>Item 6 – What characteristics should be recorded during the survey?</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                       |
| Prism Planning                                                             | Disagree - Not collecting all the information means that the Council does not/may not have a full picture of the delivery of housing in the Borough.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 6 respondents agree or had no comments to make, 4 disagreed.                                                                                                                                                                                                                                                                                                                                                                                | In future, DBC to contact all house builders on sites of 6 dwellings or more to find out if/when ground works are expected to be completed. Number of units started to be added to the trajectory information published in the SHLAA. |
| Taylor Wimpey                                                              | <p>Disagree - TWUK would disagree with the Council's conclusions on this matter and would strongly suggest that the methodology is amended to seek confirmation from developers/house builders with planning permissions that have commenced how the site is progressing. This is an important evidence base for establishing delivery rates from the sites for use, amongst other things, for the calculation of the 5YHLS.</p> <p>By not obtaining this information the Council are unable to accurately establish to what level these sites have delivered over the previous 12 months and to what level they will contribute towards housing supply over the 5 year period moving forward. This is fundamental flaw in the current process.</p> <p>It also acts as a good indicator of the lead in time/delay between</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>One commented that for sites with planning permission that have started, confirmation of progress should be sought from the builder, and it provides a good indication of lead in time to delivery on the ground.</p> <p>Another suggested that the SHLAA evidence should record the number of starts, as well as the fact that a site has started. They also suggested that the completion of ground works should also be recorded.</p> |                                                                                                                                                                                                                                       |



| Agent/Developer                                          | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Change to methodology                                                                                                 |
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|                                                          | obtaining a planning permission and actual delivery on the ground.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p><b>Response:</b><br/>There may have been some understanding of ‘survey’ here. The Council had taken this to mean ‘site survey’ which is done for the sites without planning permission, but accept it could encompass the desk top survey that the Council carries out on sites with planning permission.</p> <p>To ensure this SHLAA work is completed on time, most house builders have now already been contacted. The Council would need the timely co-operation of all house builders active in the Borough to collect the ground works information suggested. The number of units started can be collected by the Council from BC/NHBC returns directly.</p> |                                                                                                                       |
| St Modwen Developments                                   | Disagree - St Modwen would disagree with the Council’s conclusions on this matter and would strongly suggest that the methodology is amended to seek confirmation from developers/housebuilders with planning permissions that have commenced how the site is progressing.<br>By not obtaining this information the Council are unable to accurately establish to what level these sites have delivered over the previous 12 months and to what level they will contribute towards housing supply over the 5 year period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                       |
| Hartlepool Borough Council                               | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                       |
| Barratt Homes                                            | The existing approach captures all the information indicated in NPPF, except that for sites with planning permission, it only records that a site has started, and not how many units. They also do not record whether ground works are completed. BDW disagree with the council’s conclusion that the matters not collected are not considered vital to completion of a robust SHLAA. In order for the sites to feed into the trajectory and 5 year land supply, it is essential to determine the extent to which sites have started to determine a) how to project the delivery of the units over the 5 year b) determine whether all units will be delivered within the 5 year period and c) if units have already been completed, how many units need to be taken out of the 5 year land supply.<br>BDW would urge the council that where a site has started it should record the number of units and whether ground works are completed, feeding this into the housing projections. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                       |
| NLP                                                      | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                       |
| Gladman                                                  | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                       |
| Cussins                                                  | Agree- no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                       |
| Stockton BC                                              | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                       |
| Bussey & Armstrong Ltd                                   | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                       |
| Item 7 - How should development potential be calculated? |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                       |
| Prism Planning                                           | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 5 respondents agreed and made no further comments. 5 disagreed and/or made comments.<br><br>Respondents questioned whether sketching an indicative layout was a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Present sketch layouts to Steering Group to help them agree site capacities, and use illustrative layouts provided by |
| Taylor Wimpey                                            | Disagree - TWUK would question whether the Council’s Urban Design Officer sketching out an indicative layout to determine development potential/site capacity is a particularly robust and fair approach to determining site capacity.<br>TWUK and most developers/promoters generally undertake                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                       |

| Agent/Developer            | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Change to methodology                                                                                                                                           |
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|                            | background technical assessments to identify site constraints and opportunities informing the preparation of a masterplan and housing mix which they consider meets the requirements/needs of the market. These details are then submitted along with an indication of the site capacity as part of the detailed representations to the Council. The starting point for such an assessment should therefore be any information/illustrative layouts etc. submitted by the landowner or developer with an interest in the site.<br>In the absence of any information from the landowner, a standard formula to establish potential yields based on site area, an average density and a reduction for the net developable area dependant on the size of the site. Such an approach used to be employed by the Council and is outlined in the previous SHLAA methodology. | robust and fair approach to determining site capacity. Another respondent suggested this was time consuming and a simple net: gross assumption should be applied, and another mentioned that this did not take account of viability.<br><br>One respondent suggested the Steering Group should assess viability by agreeing viability or not of a series of site typologies, and market attractiveness agreed by colour coding different areas.                                                                                                                                    | developers, where appropriate.<br><br>Consider their utility after review of assessments done so far versus schemes that have actually got planning permission. |
| St Modwen Developments     | Disagree - St Modwen would question whether the Council's Urban Design Officer sketching out an indicative layout to determine development potential/site capacity is a particularly robust and fair approach to determining site capacity.<br>The starting point should be any information/illustrative layouts etc submitted by the landowner or developer with an interest in the site. In the absence of any information from the landowner, a standard formula to establish potential yield based on site area, an average density and a reduction for the net developable area dependant on the size of the site should be applied. Such an approach used to be employed by the Council and is outlined in the previous SHLAA methodology.                                                                                                                       | <b>Response:</b><br>Where developers have submitted draft layouts, these can be used to indicate site capacity, unless the Council is aware of significant planning issues that the layouts do not adequately address, e.g. if they do not take account of a heritage asset. The sketching of an indicative layout is a design led approach to establishing capacity and is more sensitive to site constraints than a purely net:gross density ratio applied to a site area would be. These sketches can be presented to the Steering Group to inform their view on site capacity. |                                                                                                                                                                 |
| Hartlepool Borough Council | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                 |
| Barratt Homes              | The NPPG states that to assess development potential the Council must look at locally determined policies, including density, taking into account site characteristics and physical constraints. The Council fulfils this by recording key local policy constraints for each site, referring to the adopted Core Strategy and other locally agreed documents, such as the Green Infrastructure Strategy. The council's Design of New Development SPD and any physical constraints are also identified for the site. BDW considers this approach appropriate.<br><br>In terms of determining density, the Council's Urban Design Officer sketches an indicative layout based on this to establish a realistic site capacity, which is considered and agreed (or not) by the SHLAA steering group, alongside their consideration of viability and                        | The Council will take a view on this after considering if any design led site capacity assessments are significantly adrift of development schemes that have subsequently got planning permission.<br><br>Issues of viability are considered                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                 |

| Agent/Developer        | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | DBC Officer Comments  | Change to methodology |
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|                        | <p>policy constraints. This seems a time consuming way to determine density. BDW would suggest the council adopt an easier, less time consuming approach. Looking ahead to EVA we would suggest the council adopt a ratio for ease of reference.</p> <p>The NPPG also states that the council must assess achievability (including viability) and suitability, in parallel. The council should seek to work with the steering group to develop an agreed position on the viability of sample sites or 'typologies' which can then be applied to other sites with similar characteristics. As for market factors, settlements could be colour coded and discussed with the SHLAA panel to determine their category/attractiveness to the development industry. BDW would be happy to assist with this research.</p> <p>BDW would urge the Council that they must assess achievability and suitability. It is essential that the council thoroughly assesses the viability of each site – develop industry agreed viability of sample sites or 'typologies' and colour-coordinating settlements to demonstrate their attractiveness to the development industry.</p> | under item 11. below. |                       |
| NLP                    | Disagree – that indicative sketches prepared by council urban design officer should determine the capacity of sites. PPG confirms that existing development schemes can be used as the basis for assessment, adjusted for site characteristics and constraints. NLP consider that, where available, information on capacity from site owners should also be taken into account.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                       |                       |
| Gladman                | This existing approach undertaken records local policy constraints and other locally agreed documents, i.e. Green Infrastructure Strategy, Design of New Development etc. The Council's urban design officer then sketches an indicative layout to establish a site capacity, which is considered by the SHLAA Steering Group alongside their consideration of viability and policy constraints. This approach goes over and above the guidance provided by paragraph 17 of PPG (reference ID: 3-017). The use of the Council's Design of New Development SPD and indicative sketches may not take into account the full viability issues of the proposed development and thus would affect the achievability of a proposal. The Council should instead refer to the guidance stated in PPG.                                                                                                                                                                                                                                                                                                                                                                       |                       |                       |
| Cussins                | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                       |                       |
| Stockton BC            | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                       |                       |
| Bussey & Armstrong Ltd | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                       |                       |

| Agent/Developer                                                                                                   | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Change to methodology                                                       |
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| Item 8 - What factors should be considered for when and whether sites/broad locations are likely to be developed? |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                             |
| Prism Planning                                                                                                    | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 7 respondents agreed, and 3 disagreed and/or made comments.<br><br>Two asked for clarification on how the Council assess whether a site is viable before presenting to the Steering Group, and offered assistance to do this. One pointed to the importance of having a local agent on the Group, but questioned the transparency of the Group, given that members have other interests in the Borough.<br>One asked how the council assesses suitability availability, etc, and suggested that details of sites with planning permission need to be included with a 10% discount applied to sites with unimplemented permissions. Sites known to be likely of failure should be automatically discounted and not considered as part of the 10% discount.<br><br><b>Response:</b><br>The Council does not assess viability in advance of the Steering Group. The Council will share whole plan viability market areas work with the Steering Group to inform the discussion. Alongside the site specific information on constraints/likely abnormalities collected by the Council, the Steering Group collectively has the expertise to decide on whether sites are likely to be viable or not.<br><br>The way the Council (and the | The Council will publish the information on sites with planning permission. |
| Taylor Wimpey                                                                                                     | Disagree - It is not clear how the Council assess whether a site is economically viable before presenting it to the SHLAA Steering Group. This should be clarified.<br>TWUK have a detailed understanding of the housing market in the Borough having undertaken developments in the past and also currently delivering housing on a number of sites and are happy to assist the Council and share their local knowledge where necessary.<br>Whether a site is viable for development is dependent on a variety of factors which differ from site to site and for proposed allocations should be considered through the Whole Plan Viability testing.<br>Determining whether a site is viable will involve a range of considerations and sources of information.<br>Should the Council consider that viability could be an issue on any site being promoted by TWUK, we would happily provide further information/clarification to the Council to address any concerns. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                             |
| St Modwen Developments                                                                                            | Disagree - It is not clear how the Council assess whether a site is economically viable before presenting it to the SHLAA Steering Group. This should be clarified.<br>Moreover, whether a site is viable for development is dependent on a variety of factors which differ from site to site and in particular land value.<br>It would seem particularly important that local agents are on the Steering Group given the reliance of 'market intelligence' for determining whether a site is viable or not. The more members of the Steering Group with varying market knowledge the more likely the conclusions are to be more robust.<br>There is also the issue of transparency given that members of the Steering Group may have other interests in the Borough.<br>As such, determining whether a site is viability will involve a range of considerations and sources of information.                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                             |
| Hartlepool Borough Council                                                                                        | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                             |
| Barratt Homes                                                                                                     | BDW are pleased to see that the council assess suitability, availability and achievability, including whether the site is economically viable. However, we would like the Council to confirm how they assess these factors to ensure their assessments are robust and well evidenced.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                             |

| Agent/Developer                                                               | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Change to methodology                                                     |
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|                                                                               | <p>Indeed the Inspector noted in the Middleton St George appeal that 'there was a distinct lack of credible hard evidence to justify the projections for some of these sites and consequently it would be unwise to place too much reliance on the potential for delivering a significant amount of the housing requirement from such sources. Matters such as environmental impact, contamination, protected species, and traffic assessments have still to be determined at some of the sites, notwithstanding the need to relocate existing occupiers from more than one of the sites, including a cattle market. Over 20% of the identified dwellings are meant to come from the emerging sites. I am not persuaded that the evidence confirms that such optimism is justified'.</p> <p>The existing SHLAA approach is to record headline figures for all sources of supply for each year in tables in the SHLAA and the projected first 5 years delivery is set out for sites without planning permission. Sites with planning permission must also be included as they make the biggest contribution to the 5 year land supply. A 10% discount must be applied to sites with unimplemented permissions. Sites known to be likely of failure should be automatically discounted and not considered as part of the 10% discount.</p> <p>The Council must ensure there is a robust evidence behind the assessment of when and whether sites/broad locations are likely to be developed.</p> | <p>Steering Group) assess suitability, availability, etc is set out in the published SHLAA methodology.</p> <p>The Council will publish the information on sites with planning permission. Sites with planning permission known to be not likely to come forward are already discounted to zero. Rather than a 10% discount on the rest, the Council undertakes a more evidence based approach – it carries out telephone surveys to collect information about the landowner/developer intentions for the site and then applies assumptions about delivery agreed by the Steering Group to the rest.</p> |                                                                           |
| NLP                                                                           | Agree – we agree that market and site information should be taken into account when considering the suitability, availability and achievability of sites. Information from site promoters should be taken into account.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                           |
| Gladman                                                                       | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                           |
| Cussins                                                                       | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                           |
| Stockton BC                                                                   | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                           |
| Bussey & Armstrong Ltd                                                        | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                           |
| <b>Item 9 - What factors should be considered when assessing suitability?</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                           |
| Prism Planning                                                                | Agree – no comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 4 respondents agreed or made no comments. One suggested that the Council's proposed approach to item 3 should not include site for less than                                                                                                                                                                                                                                                                                                                                                                                                                                                             | This time, if more sites need to be identified when the OAN is known, the |
| Taylor Wimpey                                                                 | Disagree - In view of the Council's proposed approach to item 3 this should not include site for less than 6 dwellings.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                           |

| Agent/Developer            | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Change to methodology                                                                                                                                                          |
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|                            | As previously outlined the spatial framework outlined in the Core Strategy is likely to need to change in order to ensure that the Borough's Objectively Assessment Housing Requirement (when established) can be met.<br>As set out in the Gladman decision, compliance with an emerging local plan at an early stage which is subject to objection cannot be a key indicator of suitability (i.e. whether it is deliverable rather than developable).                                                                                                                                                                                                           | 6 dwellings, and that the Core Strategy cannot now be used to determine suitability, because the OAN may show that significantly more new houses are needed. Another respondent urged the council to reappraise other allocated land, revisit constraints and take account of national and sub-regional guidance, whilst NLP suggested that suitability should be guided by market or industry requirements, and that self build plots should not be only those that are too small or have no volume house builder interest. | Group will be reconvened to see if any of the constraints on potential sites can be overcome.<br><br>No change is proposed regarding approach to identifying self build plots. |
| St Modwen Developments     | Disagree - In view of the Council's proposed approach to item 3, self-builds should not include site for less than 6 dwellings.<br>As previously outlined the spatial framework outlined in the Core Strategy is likely to need to change in order to ensure that the Borough's Objectively Assessed Housing Requirement (when established) can be met.                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                |
| Hartlepool Borough Council | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                |
| Barratt Homes              | When assessing site suitability we would urge the council to consider several additional factors not included in their existing SHLAA approach: <ul style="list-style-type: none"> <li>Consider appropriateness of identified constraints on sites/broad locations and whether such constraints can be removed</li> <li>Conduct a re-appraisal of suitability of pre-allocated land and potential to designate allocated land for different or wider range of uses</li> <li>Continue steering group to take account of national, regional and sub-regional guidance in assessing whether sites should be considered suitable, achievable and available</li> </ul> | <b>Council's response:</b><br>The Councils approach does not include sites of less than 6 dwellings.<br>The Council acknowledges that the spatial strategy may need to change if the OAN shows that significant additional new housing is required. There are elements of Core Strategy and saved local plan policies that can still be used, and the NPPF provides some guidance on suitability as well.                                                                                                                    |                                                                                                                                                                                |
| NLP                        | Disagree – PPG confirms that the suitability of sites should be guided by market or industry requirements. It would be inappropriate for the steering groups to decide that sites would be more suited to self-build plots that market housing just because no volume house builder is known to have an interest or they are small infill sites.                                                                                                                                                                                                                                                                                                                  | It may not be possible to complete the SHLAA this time until the OAN is known. If more sites need to be identified, the Group will be reconvened to see if any of the constraints on potential sites can be overcome.                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                |
| Gladman                    | The Council need to consider the appropriateness of using a development plan which is inconsistent with the requirements of the Framework. The methodology should emphasise the need to take account of how up-to-date the strategic plan policies are and consider the appropriateness of identified constraints on sites/broad locations and whether these can be overcome.                                                                                                                                                                                                                                                                                     | Regarding self build plots, the Government is placing increasing pressure on Council's to identify specific land for self-build plots. As                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                |



| Agent/Developer                                                          | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Change to methodology |
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| Cussins                                                                  | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | the objective of this is to complement and add to existing supply of new housing, it makes sense to identify sites where there is little or no interest from other parties, and no constraints that cannot be overcome.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                       |
| Stockton BC                                                              | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                       |
| Bussey & Armstrong Ltd                                                   | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                       |
| Item 10 - What factors should be considered when assessing availability? |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                       |
| Prism Planning                                                           | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 9 respondents agreed or had no comments.<br><br>One respondent advised the council to look at the delivery record of the developers or landowners putting forward sites and whether the planning background of site shows a history of unimplemented permission. The same respondent urged the council to reconsider the availability of sites with planning permission, examining potential problems that might constrain its availability. Planning permission does not necessarily mean that the site is available.<br><br>The Council will look at whether it can establish robust information about the delivery record of developers and landowners putting forward sites. Problems envisaged relate to developers and landowners who have not previously been active in the Borough, or who may have progressed a scheme through atypical market conditions or on a site with unanticipated abnormalities. |                       |
| Taylor Wimpey                                                            | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                       |
| St Modwen Developments                                                   | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                       |
| Hartlepool Borough Council                                               | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                       |
| Barratt Homes                                                            | <p>In terms of assessing availability, BDW support the councils' current gathering of information from landowners/promoters of sites to establish land ownership and carrying out legal and land searches to establish the situation, if there is any doubt. We recognise that the council is aware that it does not currently consider the delivery record of developers/landowners. In accordance with the NPPG, we would advise the council to look at the delivery record of the developers or landowners putting forward sites and whether the planning background of site shows a history of unimplemented permission.</p> <p>We would also urge the council to reconsider the availability of sites with planning permission, examining potential problems that might constrain its availability. Planning permission does not necessarily mean that the site is available.</p> <p>BDW would advise the council to look at the delivery record of the developers or landowners putting forward sites and whether the planning background of a site shows a history of unimplemented permission. The council should also reconsider the availability of sites with planning permission.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                       |
| NLP                                                                      | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                       |
| Gladman                                                                  | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                       |
| Cussins                                                                  | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                       |

| Agent/Developer                                                                                                   | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Change to methodology                                                                                                                                             |
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| Stockton BC                                                                                                       | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                   |
| Bussey & Armstrong Ltd                                                                                            | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                   |
| Item 11 - What factors should be considered when assessing achievability Including whether development is viable? |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                   |
| Prism Planning                                                                                                    | Agree - with some reservations: I accept the resource constraint issue but relying too heavily on house-builder responses (not all major house-builders are represented on the Steering Group) means that you are relying on those responses reflecting the views of all house-builders – what Persimmon consider to be a developable site is not necessarily the same as Bett Homes or Gleeson Homes for example.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 8 respondents agreed or had no comments to make, although one was an agreement with reservations. 2 respondents disagreed.<br><br>No respondents suggested that individual site viability be undertaken, but suggestions included looking at values in housing market sub areas and getting a broad understanding of abnormal development costs of sites. One respondent also had reservations around how the Steering Group could reflect a potentially wide variation of company positions on viability and build out rates. | More detailed site assessment sheets will be published as an Appendix to the SHLAA, as well as the summaries about site constraints included within the document. |
| Taylor Wimpey                                                                                                     | Disagree - TWUK accept that the Council are unable to undertake individual viability assessments on individual sites however an assessment of values in the housing market sub areas would be a good starting point along with a broad understanding of the abnormal development costs of the sites This will provide the Council with vital information on the local market and viability and will assist the understanding of individual sites.<br>The capacity for developers to complete developments and associated delivery rates is an important consideration.<br>Consideration of the current status of the land (is it occupied with tenants, does it require clearance/remediation), the upfront infrastructure costs and delivery timescales are important factors to consider whether a site will come forward at present and, if it does, the likely start time and delivery rates.                                                                             | In response to Item 7 above, one respondent suggested the Steering Group should assess viability by agreeing viability (or not) of a series of site typologies, and market attractiveness agreed by colour coding different areas.                                                                                                                                                                                                                                                                                             |                                                                                                                                                                   |
| St Modwen Developments                                                                                            | Disagree- It is accepted that the Council are unable to undertake individual viability assessments on individual sites. A Whole Plan Viability Appraisal should be undertaken as part of the emerging Site Allocations and will form a vital part of the evidence base, this will provide the Council with vital information on the local market and viability and will assist the understanding of individual sites.<br><br>In terms of the capacity for developers to complete developments, this is an important consideration when the landowner is also a house builder/developer. However, the achievability of a site is not entirely dependent on the site being promoted by a house builder or developer and should therefore not be discounted on this basis.<br><br>The suggestion that the past annual completions rates for sites are considered by the SHLAA Steering Group directly conflicts with previous suggestions that this important information is not | <b>Response</b><br>The Council has been collecting information about values in housing market sub areas for its whole plan viability work, and this can be made available to inform the Steering Group discussion, and is similar to the colour coding idea suggested.<br><br>Regarding understanding abnormal costs, the stakeholder information that we get back from statutory and                                                                                                                                          |                                                                                                                                                                   |



| Agent/Developer                                                                                                   | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                 | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Change to methodology |
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|                                                                                                                   | currently collected by the Council (Item 6 and 10). As previously outlined this information should be gathered and considered.                                                                                                                                                                                                                                                                                                | other consultees identifies the main issues that could result in abnormal costs, but the Council and its consultees generally does not have the resources to convert this into costs – that is the expertise that the house builder members of the Steering Group bring to the table. Sites are not discounted if a house builder does not already have an interest in it, but is reflected in a longer ‘time to first completion’ assumption.<br><br>Also to clarify, information about actual completions is collected by the Council. Where first hand information about future build out rates cannot be obtained, past completion rates are used to inform estimates of future completions. |                       |
| Hartlepool Borough Council                                                                                        | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Barratt Homes                                                                                                     | BDW agree with the council that no change is needed to the existing SHLAA approach.                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| NLP                                                                                                               | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Gladman                                                                                                           | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Cussins                                                                                                           | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Stockton BC                                                                                                       | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Bussey & Armstrong Ltd                                                                                            | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Item12 - What happens when constraints are identified that impact on suitability, availability and achievability? |                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Prism Planning                                                                                                    | Agree – no comments                                                                                                                                                                                                                                                                                                                                                                                                           | 6 respondents agreed or had no comments to make.<br><br>2 disagreed and 2 made comments. Disagreement was to the approach that discounts sites on the basis of constraints, which might be surmountable. It was suggested that more needs to be done on ‘how’ constraints can be overcome, including actively engaging landowners/developers to see if they can assist in overcoming constraints. The policy constraints identified should also be reviewed, given the recent Gladman appeal decision.<br><br><b>Response:</b><br>Agreement responses noted. There is already a table in the                                                                                                     | No change.            |
| Taylor Wimpey                                                                                                     | Disagree - The Council should also actively seek to engage developers/landowners to see if they can assist in overcoming constraint and get an indication of the associated timescales for doing so. The vast majority of constraints can be overcome through detailed design and mitigation. Sites should therefore not be discounted on the basis of an apparent constraint unless the constraint is deemed insurmountable. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| St Modwen Developments                                                                                            | Disagree - Provision should be included within the assumptions on lead-in times and delivery rates that allow for overcoming any identified site constraints.<br><br>The Council should also actively seek to engage developers/landowners to see if they can assist in overcoming constraints.                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Hartlepool Borough Council                                                                                        | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Barratt Homes                                                                                                     | NPPG suggests considering the action needed to remove constraints, and when, how, and the likelihood of this being                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |

| Agent/Developer                                                               | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                          | Change to methodology                                             |
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|                                                                               | achieved. In preparing a SHLAA the council must look at when and how constraints could be removed and the likelihood of broad sites/locations being delivered. The council currently identify the action needed and record this. BDW agree with the council's proposed approach to also add the timing and likelihood of the constraint being overcome. We would also urge the council to look at 'how'. This will help accurately predict the deliverability of sites. This should feed into the trajectory in accordance with paragraph 47 of the NPPF "for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they maintain delivery of a five-year supply of housing land to meet their housing target". | SHLAA (5.6 in Update 5) that sets out how constraints identified are being addressed. The Council is being as proactive in addressing these constraints as time and resources allow, and engages with developers/landowners where sites are within scope for consideration as housing allocations in a DPD. The information about policy constraints will be updated to reflect current policy circumstances. |                                                                   |
| NLP                                                                           | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                   |
| Gladman                                                                       | Gladman note that whilst the Council propose to add the timing and likelihood of overcoming constraints, it does not fully consider paragraph 022 (Reference ID 3-022) of PPG which states 'Actions might include the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy, which is currently constraining development.'<br>The Core Strategy was adopted in 2011 and is not a Framework compliant development plan. If the Council are unable to identify a range of sites which are suitable, available and achievable, then the Council should undertake a review of all policies contained with the Core Strategy to ensure that they are in accordance with national planning policy and guidance.                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                   |
| Cussins                                                                       | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                   |
| Stockton BC                                                                   | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                   |
| Bussey & Armstrong Ltd                                                        | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                   |
| Item 13 - How should timescale & rate of development be assessed & presented? |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                   |
| Prism Planning                                                                | Agree – no comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 5 respondents agreed, 3 disagreed, 2 made comments.<br>Those disagreeing suggested that build out rates of sites already underway should also be looked at,                                                                                                                                                                                                                                                   | As proposed in consultation.<br>Plus:<br><br>Local property agent |
| Taylor Wimpey                                                                 | Disagree - It is suggested that telephone surveys establish build out rates and lead in times.<br>As previously outlined, information also needs to be gathered on                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                   |

| Agent/Developer            | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Change to methodology                                                                                 |
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|                            | past build out rates for sites with planning permission that have commenced. This is vital to determining the housing trajectory of deliverable and developable sites. Care should be taken in making assumptions on the number of developers per site and build out rates. Multiple developers on site can actually reduce typical delivery rates per developer.                                                                                                                                                                                                                                                                                                                                                                                                                                                    | and that multiple developers can sometimes reduce typical delivery rates, though otherwise could deliver at up to 60 dwellings per annum, provided there is not market saturation of similar sites. They also suggest that the methodology should say who the phone survey was carried out with.                                                                                                                                                                                                                                                                     | (Carvers) to be added to the Steering Group.                                                          |
| St Modwen Developments     | Disagree - The Council must also take into consideration information provided by the landowners/developers for each site on lead in times and build out rates.<br>The information proposed to be gathered by Item 10 (past built out rates for developers) should also be fed into this process.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Response</b><br>Past build out rates information is collected and used where first hand information on future build out rate is not available.                                                                                                                                                                                                                                                                                                                                                                                                                    | Reality check with Steering Group suggested 60 dpa build out rate for sites with multiple developers. |
| Hartlepool Borough Council | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | The assumptions about higher building rates where more than one developer is present were provided by the HBF in 2008 and the Council is not aware that this has been replaced or rescinded. It will reality test the proposed alternatives with the HBF and Steering Group.                                                                                                                                                                                                                                                                                         | Contact HBF to see if an update to 2008 letter regarding build out rates could be provided.           |
| Barratt Homes              | The Council currently conduct telephone surveys to establish build out rates and lead in times on small and larger sites. BDW believes the Councils methodology should state who these telephone surveys are carried out with.<br><br>We agree with the councils' current approach of agreeing generic assumptions with the steering group applied to sites where no specific information is available. In developing these assumptions we would urge the council to consider past delivery rates to determine general delivery guidelines for broad locations.<br><br>BDW agree with the councils' current approach but would urge them to state who telephones survey are carried out with in their methodology and consider past delivery rates when determining general delivery guidelines for broad locations. | Notwithstanding the above, if there is specific evidence of lower build out rates arising in Darlington, this would be reflected in the trajectory. Telephone interviews are with the agents/landowners/developers who applied for the planning permission, to get first hand information about intended timing of delivery and build out rates. The Council can reference the lines of data for which telephone contact was made. A local agent is to be added to the Steering Group, and their input could be useful where no telephone survey could be conducted. | The Council will reference the lines of data which are from telephone survey.                         |
| NLP                        | Disagree – PPG confirms that the advice of local agents and developers will be important in assessing lead times and build-out rates. It is not identified who the telephone interviews will target or why they are necessary.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                       |
| Gladman                    | Gladman approve of the Council's decision to provide an appendix detailing the projected build out rates on all sites in order to better accord with PPG. This should be updated annually to ensure that the envisaged build out rates reflect local market circumstances. The Council should avoid applying unrealistic and overambitious delivery assumptions as a means of absorbing significant housing numbers and consequently artificially reducing the ability to meet its housing need, as the approach is unsound and could have serious implications for future housing delivery across Darlington. The                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                       |

| Agent/Developer                                  | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Change to methodology        |
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|                                                  | <p>Council must ensure that it is able to demonstrate a rolling five year supply of deliverable housing sites.</p> <p>For larger schemes the Council may consider increasing its build out rates, but only if there are multiple developers working on site. The Council must be cautious in applying this approach as it must reflect the current local conditions. From our experience average annual delivery rates range from 30 dwellings per annum and up to 60 dwellings per annum when multiple developers are involved.</p> <p>In areas where there are multiple sites of a similar size coming forward within a similar timeframe, the Council will need to take into account market saturation and apply an appropriate discount to the expected delivery rates.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                              |
| Cussins                                          | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                              |
| Stockton BC                                      | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                              |
| Bussey & Armstrong Ltd                           | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                              |
| <b>Item 14 - Determining windfall allowance.</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                              |
| Prism Planning                                   | Agree – no comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>7 respondents agreed and made no further comments.</p> <p>One respondent pointed out that historic delivery is 27 dpa from windfalls, and that any figure used should be robustly evidenced, and should reflect the previous year's delivery.</p> <p>One respondent disagreed, saying that compelling evidence needs to be provided, another that forecasts should be only related to previous years data and another that future trends should be taken into account.</p> <p><b>Response:</b><br/>The Council considers its approach to projecting the contribution of windfalls to be based on compelling evidence, taking into account several years past completions data from this</p> | As proposed in consultation. |
| Taylor Wimpey                                    | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                              |
| St Modwen Developments                           | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                              |
| Hartlepool Borough Council                       | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                              |
| Barratt Homes                                    | <p>The Council currently reports a time series of past windfall data back to 2006 (excluding garden land) to justify its proposed windfall allowance to the SHLAA Steering Group. We note the inclusion of historic windfall delivery rates taken into account – recording this time series of evidence is regarded as meeting the 'compelling' standard set by NPPF. The council must also take into account expected future trends.</p> <p>BDW agree with the approach currently been taken, but would also like to see the council take into account expected future trends.</p>                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                              |
| NLP                                              | <p>Disagree – PPG confirms that compelling evidence is required to justify including a windfall allowance in the 5 year supply.</p> <p>Compelling evidence must demonstrate that sites have become available in the past and will continue to provide a reliable source of</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                              |

| Agent/Developer                                         | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | DBC Officer Comments                                                                                                                                                                                                                                                   | Change to methodology                                                                                                                                                                                   |
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|                                                         | supply in the future, paragraph 48 NPPF.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                         |
| Gladman                                                 | <p>The Council propose no change to its windfall allowance, the Council suggest that it can demonstrate the delivery of previous windfall delivery from 2006 to justify future windfall assumptions to the SHLAA Steering Group. Paragraph 48 of the Framework requires compelling evidence for the inclusion of windfall sites in a Council's five year housing land supply. Any allowance should be realistic having regard to the historic windfall delivery rates and expected future trends. Over the period 2006-2014 the Council have delivered on average 27 dwellings per annum on non-garden sites. However, table 4.2 of the 'Making and Growing Places Preferred Options: Housing Technical Paper' indicates that the level of windfall going forward will be more than double the historic windfall delivery rates.</p> <p>A table to set this out was submitted.</p> <p>Based on the above the Council will be unable to meet the assumptions made for future windfall delivery, if the Council continue with such an approach it will provide an unrealistic delivery assumption and the level of housing required will fail to be delivered. The Council should ensure that future assumptions on the delivery of windfall sites should reflect previous year's delivery.</p> | source and identifying new sources, e.g. arising from changes to PD rights. Because of the effect of these changes, relying on previous years data only for the projection could significantly under forecast, and allows future trends to be picked up and reflected. |                                                                                                                                                                                                         |
| Cussins                                                 | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                         |
| Stockton BC                                             | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                         |
| Bussey & Armstrong Ltd                                  | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                         |
| <b>Item 15 - How should the assessment be reviewed?</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                         |
| Prism Planning                                          | Agree – no comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                         |
| Taylor Wimpey                                           | Agree - The forecasting forward for the 5 year period must also include sites with planning permission and these are the main source of supply in this period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 9 respondents agreed or had no comments to make, one disagreed and made comments.                                                                                                                                                                                      |                                                                                                                                                                                                         |
| St Modwen Developments                                  | Agree- St Modwen welcome the inclusion of an appendix detailing the projected build out on all sites including those with planning permission. It is vital that those with planning permission are also included to show whether there are sufficient sites to meet the 5 housing land supply requirement (once established).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Those commenting asked that forecasting forward must include sites planning permission, and that these should make up a large proportion of the Council's 5 year supply, and that sites without planning permission should be in years 4 and 5 only. One suggests      | As proposed in consultation, plus to propose an approach to Steering Group that only includes sites without planning permission in years 4 and 5, unless there is specific contrary evidence available. |
| Hartlepool Borough Council                              | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                         |
| Barratt Homes                                           | The existing SHLAA approach is to record headline figures for all                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                         |

| Agent/Developer                                                                                                                                        | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Change to methodology |
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|                                                                                                                                                        | <p>sources of supply for each year in tables in the SHLAA and the projected first 5 years delivery is set out for sites without planning permission. An indicative trajectory is an effective tool for managing the 5 year housing land supply and demonstrating certainty of delivery to an Inspector at appeal decisions or examination of the Local Plan.</p> <p>The Councils proposed approach is to include an appendix to the SHLAA detailing the projected build out on all sites (including ones with planning permission). BDW disagree with this approach. The source of supply for each year in the SHLAA must include sites with planning permission. Sites with planning permission provide the council with confirmed (in the majority of cases) numbers of units being delivered in the first 5 years. Sites with planning permission should form the basis of a large proportion of the councils 5 year land supply given the time taken to get planning permission. Sites without permission can generally only be included in delivery numbers in years 4 and 5.</p> <p>The Inspector noted in the Middleton St George appeal that as it currently stands about 40% of the houses assumed to be delivered in 5 years have no planning permission. Instead 60% are to be built on emerging sites, suitable, achievable and deliverable sites and windfalls. The Inspector confirmed that there was no guarantee of early delivery given levels of historic objections and significant infrastructure requirements.</p> <p>BDW agree with the Councils proposed approach to include risk assessment text which will be included in the analysis of the headline trajectory, to be agreed with the Steering Group. We do not think the Council need to include a risk rating for each site – including a risk assessment in the text as part of the assessment of site suitability, availability and achievability is sufficient. The element of risk should be reflected in whether the site is included as certain, uncertain or discounted – a risk rating should not be needed.</p> | <p>that risk assessment only needs to be in the text, not for each site.</p> <p><b>Response:</b><br/>Data on sites with planning permission is collected and reported in the SHLAA – e.g. see Section 6 of Update 5.<br/>The Council accepts that some of its assessments of delivery on sites without planning permission for the Gladman appeal were over optimistic, and is revisiting these.</p> <p>Limiting the inclusions of sites without planning permission in years 4 and 5 only seems arbitrary though, particularly where the Council has evidence, e.g. because of progress on a land sale, that it will come forward earlier.</p> |                       |
| NLP                                                                                                                                                    | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                       |
| Gladman                                                                                                                                                | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                       |
| Cussins                                                                                                                                                | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                       |
| Stockton BC                                                                                                                                            | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                       |
| Bussey & Armstrong Ltd                                                                                                                                 | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                       |
| <b>Item 16: What if the trajectory indicates there is not enough supply to meet the objectively assessed need? If more land is needed, what is the</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                       |



| Agent/Developer                                                         | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Change to methodology                                                                                                                       |
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| <b>balance between housing need and constraints on the use of land?</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                             |
| Prism Planning                                                          | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 6 respondents agreed or had no comments to make on the proposed approach. 4 made comments. Those commenting suggested that a full unconstrained OAN needs to be established as soon as possible, and then the new local plan housing requirement. A High Court decision is cited in support. They also suggest that without a 5 year supply, the Council must encourage housing sites to come forward through planning applications and grant planning permission, in line with NPPF, to plug the gap. One points out that there are no overarching constraints outlined in policies within the NPPF such as Green Belts and AONBs that apply in the Borough of Darlington. | The Council will consider the role that the Steering Group could have in identifying more land for housing and getting constraints removed. |
| Taylor Wimpey                                                           | <p>The Council suggest that this circumstance has not arisen before. The recent Gladman appeal at Middleton St George suggests otherwise. TWUK suggest that it is of fundamental importance that the Council establishes its full OAN as soon as possible. The full OAN should be an entirely unconstrained figure and undertaken in accordance with the 3 stage approach in NPPG.</p> <p>It is clear that the housing requirement provided in the Core Strategy is out of date and does not form an appropriate basis to plan the future provision of housing in the Borough. The establishment of the full OAN should then lead onto the establishment of a new housing requirement through the local plan process.</p> <p>In the absence of up to date allocations to create a sufficient supply the Council must encourage housing sites to come forward through planning applications and grant planning permission, in line with NPPF, to plug the gap as this is the only way that they will be able to demonstrate a 5 year housing land supply.</p>                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                             |
| St Modwen Developments                                                  | <p>The Council suggest that this circumstance has not arisen before. The recent Gladman appeal suggests otherwise. It is of fundamental importance that the Council establishes its full OAN as soon as possible. The full OAN should be an entirely unconstrained figure and undertaken in accordance with the 3 stage approach in NPPG. 5</p> <p>The Council must seek to meet its full OAN and should not be looking to hide behind constraints. As per the Gallagher Homes High Court Decision which states at para 88 that, <i>"a number of points are now, following Hunston, clear...although the first bullet point of paragraph 47 directly concerns plan making, it is implicit that a local planning authority must ensure that it meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as consistent with the policies set out in the NPPF, even when considering development control decisions"</i>. Paragraph 94 then states, <i>"the balancing exercise required by paragraph 47 cannot be performed without being informed by the actual full housing need"</i>.</p> <p>There are no overarching constraints outlined in policies within the NPPF such as Green Belts and AONBs that apply in the Borough of</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                             |

| Agent/Developer            | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Change to methodology |
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|                            | <p>Darlington.</p> <p>It is clear that the housing requirement provided in the Core Strategy is out of date and does not form an appropriate basis to plan the future provision of housing in the Borough. The establishment of the full OAN should then lead onto the establishment of a new housing requirement through the local plan process.</p> <p>In the absence of up to date allocations the Council must encourage housing sites to come forward and grant planning permission, in line with NPPF, to plug the gap as this is the only way that they will be able to demonstrate a 5 year housing land supply in the short term.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>engage with neighbouring authorities within the housing market area under the Duty to Cooperate.</p> <p>One respondent notes the pro-activeness of the Council to release its own land but this has been found to not be enough, and that a review the Core Strategy would allow the Council to opt for a more appropriate spatial strategy that would see sustainable development located near existing key facilities and essential services across the borough.</p>                                                                                                                                                                                                                                      |                       |
| Hartlepool Borough Council | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                       |
| Barratt Homes              | <p>The proposed approach indicates that the council has not given this some consideration, the existing approach reflected the fact that this circumstance has not arisen previously. We agree with the continuation of the existing approach – the SHLAA steering group would be recalled, to consider the evidence further, and further investigations would be made into whether council owned land could be released earlier, and whether there was any flexibility in the policy constraints identified, taking into account the policies of the NPPF considered as a whole. In conducting this assessment, the council should also look at the physical constraints identified and determine if there is a way to overcome them to bring sites forward.</p> <p>If a shortfall is identified we would urge the council to adopt a 3 pronged approach to resolve the issue: a. identify the next most suitable sites, b. review the policy burden on sites via EVA and look at the physical constraints to see if they can be overcome, c. if the need can still not be met locally, the council must consider how needs might be met in adjacent areas in accordance with the duty to cooperate.</p> <p>In the situation where the council cannot indicate enough supply to meet demand, the council must look into whether any council owned land could be released earlier, analyse the site assessment, looking at policy and physical constraints to identify if there was any flexibility in the policy constraints identified and if the physical</p> | <p><b>Response:</b></p> <p>The Council is commissioning work to establish the full OAN and to undertake an up to date SHMA. The initial OAN may be known in June 2015.</p> <p>Planning applications for new housing will be considered against the NPPF and the relevant up to date policies of the adopted development plan.</p> <p>The Council is considering how proactive and in what circumstances it should be in encouraging planning applications for new housing. The Council does not envisage not being able to meet its OAN within the Borough.</p> <p>It will also consider the role that the Steering Group could have in identifying more land for housing and getting constraints removed.</p> |                       |



| Agent/Developer                                                      | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | DBC Officer Comments                                               | Change to methodology |
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|                                                                      | constraints can be overcome. Where the council can still not meet the need locally, the council must consider how needs might be met in adjacent areas in accordance with the duty to cooperate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                    |                       |
| NLP                                                                  | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                    |                       |
| Gladman                                                              | The Council propose that if sufficient land cannot be identified the Council will revisit its planning policy and evidence base. The Council's housing requirement does not provide a Framework compliant OAN, instead the housing requirement is based on the now revoked RSS. The Council must ensure that it undertakes an independent Strategic Housing Market Assessment (SHMA), taking into account the wider area to identify its OAN. Once the housing need has been identified the Council will then be able to identify whether or not there is sufficient land available to meet the identified need. If the Council are unable to identify a sufficient number of sites to meet the identified need, it may be appropriate for the Council to consider a review of the Core Strategy. This ensures that all policies are consistent with the requirements of national policy and guidance. If the Council cannot identify enough land to meet the identified need they should actively engage with neighbouring authorities within the housing market area under the Duty to Cooperate. Gladman acknowledge the pro-activeness of the Council to release land owned by the Council however as indicated by the Inspector in the Middleton St. George appeal, the Council have been unable to dispose of a sufficient level of land needed for residential development to meet the housing need within the Borough. The strategy has delivered little more than 50% of the target during the last three years, this therefore supports the need to review the Core Strategy and opt for a more appropriate spatial strategy that would see sustainable development located near existing key facilities and essential services across the borough. This is in accordance with the key theme running throughout the Framework to promote sustainable development. |                                                                    |                       |
| Cussins                                                              | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                    |                       |
| Stockton BC                                                          | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                    |                       |
| Bussey & Armstrong Ltd                                               | No response.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                    |                       |
| <b>Item 17: Identifying sites or broad locations beyond 5 years.</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                    |                       |
| Prism Planning                                                       | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 8 respondents either agreed or had no comments to make, and 2 made | No change.            |

| Agent/Developer            | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | DBC Officer Comments                                                                                                                                                          | Change to methodology                                      |
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|                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | comments.                                                                                                                                                                     |                                                            |
| Taylor Wimpey              | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                               |                                                            |
| St Modwen Developments     | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                               |                                                            |
| Hartlepool Borough Council | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                               |                                                            |
| Barratt Homes              | The SHLAA must identify specific sites up to 15 years. The Council currently identify specific sites up to 2026. The Council needs to identify sites up to 2031 if adopted next year.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                               |                                                            |
| NLP                        | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                               |                                                            |
| Gladman                    | <p>The Council believe that this requirement meets PPG in full as it has identified specific sites for development up to 2026. In accordance with the Framework, local planning authorities should identify a supply of specific, developable sites or broad locations for growth where possible for years 11-15 of the plan period. The Council has identified specific sites up to 2026 and proposes no change at present, but will be reviewed in 2016.</p> <p>Gladman are concerned that the identified sites contained within the Core Strategy leading up to 2026 may not identify a sufficient number of sites to meet the OAN. It cannot be certain whether the housing requirement at this time reflects the true OAN. Therefore additional sites for residential development may be required for later stages in the plan period, depending on the outcome of OAN assessment.</p> |                                                                                                                                                                               |                                                            |
| Cussins                    | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                               |                                                            |
| Stockton BC                | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                               |                                                            |
| Bussey & Armstrong Ltd     | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                               |                                                            |
| Item 18: Core outputs      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                               |                                                            |
| Prism Planning             | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 8 out of 10 responses agreed or had no comments.                                                                                                                              | None other than proposed approach set out in consultation. |
| Taylor Wimpey              | Disagree - As outlined previously, a trajectory must also be included for sites with planning permission as such sites form the main source of supply in the 5 year period. TWUK also consider that that detailed reasons should be given for all sites that have been submitted particularly where detailed information has been provided by the landowner/developer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Those disagreeing mentioned that sites with planning permission must be included in the trajectory, and one suggested that detailed reasons be given for all sites submitted. |                                                            |

| Agent/Developer                                                                      | Comments Made                                                                                                                                                                                                                                                                         | DBC Officer Comments                                                                                                                                                                                                                                                                                                                     | Change to methodology                                                                        |
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| St Modwen Developments                                                               | Disagree - As per earlier comments, sites with planning must be included within the trajectory to ensure that an accurate understanding of the 5 year housing land supply position can be obtained.                                                                                   | <b>Response:</b><br>Sites with planning permission are included in the trajectory and discussed in the SHLAA (e.g. see section 6 of Update 5). Sites are only excluded if there are specific reasons to do so, e.g. the developer is known to now not be proceeding with it or an unexpected constraint has emerged affecting viability. |                                                                                              |
| Hartlepool Borough Council                                                           | Agree – no comments.                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| Barratt Homes                                                                        | BDW agree that the council fulfil the set of standard outputs, in a publicly accessible form as stated in NPPG. Produced for the assessment these core outputs ensure consistency, accessibility and transparency.                                                                    |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| NLP                                                                                  | No comments.                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| Gladman                                                                              | No comments.                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| Cussins                                                                              | Agree – no comments.                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| Stockton BC                                                                          | Agree – no comments.                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| Bussey & Armstrong Ltd                                                               | Agree – no comments.                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| Item 19: Determining deliverability and developability in relation to housing supply |                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| Prism Planning                                                                       | Agree – no comments.                                                                                                                                                                                                                                                                  | All 10 responses agree.                                                                                                                                                                                                                                                                                                                  | As proposed in consultation document – referencing footnotes 11 and 12 of NPPF in the SHLAA. |
| Taylor Wimpey                                                                        | Agree - TWUK would welcome the proposed change and consider it vital that the SHLAA includes the tests from footnotes 11 and 12 of NPPF are includes as these form the basis for assessing the sites.                                                                                 |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| St Modwen Developments                                                               | Agree - St Modwen would welcome the proposed change.                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| Hartlepool Borough Council                                                           | Agree – no comments.                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| Barratt Homes                                                                        | The council state that NPPF footnotes are applied to determine deliverability and developability, but recognise that these definitions need to be added in to the appropriate point in the text. BDW agree with this proposed approach to make the basis for the assessment explicit. |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| NLP                                                                                  | No comments.                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| Gladman                                                                              | No comments.                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| Cussins                                                                              | Agree – no comments.                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| Stockton BC                                                                          | Agree – no comments.                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| Bussey & Armstrong Ltd                                                               | Agree – no comments.                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| Item 20: Starting point for 5 year supply.                                           |                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                          |                                                                                              |
| Prism Planning                                                                       | Agree - The decision of the Gladman appeal needs to be fully                                                                                                                                                                                                                          | 5 respondents agreed, 5 disagreed                                                                                                                                                                                                                                                                                                        | None proposed,                                                                               |

| Agent/Developer            | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Change to methodology                                                                                                    |
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|                            | considered and acted upon accordingly. Failure to do so could result in similar appeal decisions against the Council, which I presume the Council would wish to avoid.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | and/or made comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | though the benchmark against which the 5 year supply will be measured will be based on the OAN as soon as this is known. |
| Taylor Wimpey              | Disagree - TWUK consider the establishing of the full OAN figure is absolutely vital in light of the Gladman appeal. The SHLAA should be focused on delivering the full OAN.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Comments made stressed that the need to establish a full OAN is vital and the SHLAA should focus on delivering the OAN, in accordance with particularly paras 14, 47, 152 and 159 of NPPF. They comment that the OAN would provide the benchmark for the assessment of the presence/absence of 5 year supply. The OAN should be established in parallel with the SHLAA.<br><br><b>Response:</b><br>The objectively assessed needs exercise will be a separate technical exercise to the SHLAA, though the final figure from that work would provide the benchmark for the assessment of presence/absence of 5 year supply. This means that the SHLAA process may not be able to conclude until the OAN work is completed. It is currently anticipated that this could be in May 2015. |                                                                                                                          |
| St Modwen Developments     | Disagree - The establishing of the FOAN figure is absolutely vital in light of the Gladman appeal. The SHLAA should be focused on delivering the FOAN.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                          |
| Hartlepool Borough Council | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                          |
| Barratt Homes              | <p>The Gladman appeal decision noted that the housing requirement currently being used by the council is based on the North East Regional Plan now revoked. This requirement included a significant element of planning population redistribution, in favour of inner parts of the North East conurbations to support the regeneration and redevelopment of other brownfield sites. Therefore, Darlington’s medium and long term targets are consequently constrained. The Council did not make an assessment of FOAN when preparing the Core Strategy. The Inspector therefore concluded that the council cannot demonstrate a 5 year supply of deliverable sites, within the OAN as required.</p> <p>The Gladman appeal Inspector concluded that the current approach does not represent an appropriate base for housing requirement element of housing land supply in 2014, particularly as Durham has no cooperative arrangements with Teesside authorities to promote the diversion of some of its growth, as envisaged in the regional plan.</p> <p>The Inspector notes that the council commissioned a Strategic Housing Market Assessment in 2012 that suggested a correct growth of households per annum. However, the Inspector stated that this analysis, only represents the first part of the three stage process to establish FOAN as outlined in the NPPG. It does not adjust the household projections to allow for economic growth rates or assess that result in the context of market signals.</p> <p>The Council must conduct an objectively assessed needs exercise, the final figure of which would provide the benchmark for the assessment of the presence/absence of 5 year supply.</p> <p>Given the Inspector’s comments at the appeal the council must conduct an objectively assessed need, to provide a benchmark for the assessment of the presence/absence of a 5 year supply.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                          |

| Agent/Developer            | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                      | Change to methodology                                                                                                                                              |
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| NLP                        | The Inspector in the Gladman Appeal at MSG was clear that the council needed to review its objectively assessed need and that the core strategy housing requirement is out of date. We would expect the objectively assessed need to be reviewed in parallel with the SHLAA update.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                    |
| Gladman                    | The proposed approach to item 20 is dependent on the outcome of the planning appeal at land at Sadberge Road, Middleton St George, which has now been published. The Inspector found that housing policies CS1 and Local Plan policies E2 and H7, are considered to be out of date and/or time expired.<br>Darlington's housing targets were derived from a top down housing target and never an objective assessment of need. The Council should undertake an independent assessment to identify its full OAN as required by the Framework principally in §14, §47, §152 and §159. This should be undertaken in a systematic and transparent way to ensure that the plan is based on a robust evidence base. The Council should then assess its 5 year housing land supply against its OAN instead of relying on housing policies which have been found inconsistent with national policy and guidance. |                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                    |
| Cussins                    | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                    |
| Stockton BC                | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                    |
| Bussey & Armstrong Ltd     | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                    |
| Item 21: deliverable sites |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                    |
| Prism Planning             | Agree- no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 8 respondents agreed or had no comments to make. 2 respondents disagreed.<br>One suggests that only sites with planning permission can be included in the 5 year supply, and points to the Inspector's decision letter in the recent Gladman appeal to support that. They indicate that sites with no formal status in emerging plans should not be included.<br><br><b>Response:</b><br>Neither the Inspector of the recent Gladman appeal nor NPPF/NPPG | Discuss with Steering Group how to moderate the industry's own forecasts on deliverability of sites without planning permission, to make the SHLAA more realistic. |
| Taylor Wimpey              | Disagree - TWUK would suggest that the Council must properly apply the deliverability tests. It is clear that only deliverable sites, namely those with planning permission can be included in the 5 year supply.<br>The Inspector in the Gladman appeal makes it clear that the Council's suggested supply for the 5 year period over relies heavily on sites in the emerging plan, which have no formal status, are subject to objection and require scrutinising via Examination in Public. The Inspector states (paras. 30 & 31, " <i>about 40% of the houses that are assumed to be delivered within five years do not have planning permission. These dwellings would be built at emerging sites, suitable, available and deliverable sites and windfalls. I accept that there is evidence that justifies the inclusion of additional windfalls in later years.</i> ")                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                    |

| Agent/Developer            | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Change to methodology |
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|                            | <p><i>Although some development may be achieved on emerging sites, if the Council takes a liberal view in granting planning permission in advance of the adoption of its Making and Growing Place DPD, their development is by no means a certainty. Given the level of historic objections to some of them, legal challenges cannot be ruled out and significant infrastructure requirements will undoubtedly cause delays at some sites.</i></p> <p><i>There was a distinct lack of credible hard evidence to justify the projections for some of these for some of these sites and consequently it would be unwise to place too much reliance on the potential for delivering a significant amount of housing from such sources.</i></p> <p><i>Matters such as environmental impact, contamination, protected species and traffic assessments have still to be determined at some of the sites, notwithstanding the need to relocate existing occupiers from more than one of the sites, including a cattle market. Over 20% of the identified dwellings are meant to come from the emerging sites I am not persuaded that the evidence confirms that such optimism is justified”.</i></p> <p>In light of the above the Council must take a realistic view on the deliverability of sites based on the tests at footnote 11 of NPPF to determine which sites can be included within the deliverable supply for the 5 year period.</p> | <p>indicate that the Council cannot rely on sites without planning permission as contributing to the five year supply, but it is clear that the Council needs to be less optimistic about the delivery that could come from sites without planning permission. In many cases, the evidence that was presented reflected what the promoters of the site told the Council were their intentions. The Council will need to discuss how to moderate the industry's own forecasts to make the SHLAA more realistic.</p> |                       |
| St Modwen Developments     | <p>Disagree - St Modwen would suggest that the Council must properly apply the deliverability tests in line with footnote 11 of NPPF. It is clear that only deliverable sites, namely those with planning permission can be included in the 5 year supply.</p> <p>The Inspector in the Gladman appeal makes it clear that the Council's suggested supply for the 5 year period over relies on emerging site which have no formal status.</p> <p>The response refers to the Inspector's report paras 30 &amp; 31 (see response above), and concludes that in light of the above the Council must take a realistic view based on the tests at footnote 11 and the Inspectors of NPPF to determine which sites can be included within the deliverable supply for the 5 year period.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                       |
| Hartlepool Borough Council | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                       |
| Barratt Homes              | BDW agree that no change is needed to the existing SHLAA approach.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                       |
| NLP                        | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                       |
| Gladman                    | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                       |

| Agent/Developer                                                                | Comments Made                                                                                                                                                                                                                                                                                                                                          | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Change to methodology                                                                               |
|--------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
| Cussins                                                                        | Agree – no comments.                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| Stockton BC                                                                    | Agree – no comments.                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| Bussey & Armstrong Ltd                                                         | Agree – no comments.                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| Item 22: What constitutes a developable site in the context of housing policy? |                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| Prism Planning                                                                 | Agree – no comments.                                                                                                                                                                                                                                                                                                                                   | 9 respondents agreed or made no comments. One respondent disagreed, saying that the Council should include sites as developable even if this takes the stock of developable sites well beyond the 6-15 year requirement.<br><br><b>Response:</b><br>Outside of land at the urban fringe and on the edge of the larger villages, there is no prospect of the land being in a suitable location for housing development at the point envisaged for sustainability reasons. To consider these in detail now is not resource efficient. | None.                                                                                               |
| Taylor Wimpey                                                                  | Disagree - TWUK would like to point out that because a site has been identified as ‘developable’ by the Council does not necessarily mean that the Council must allocate it for housing. The Council must identify all sites that are ‘developable’ regardless of whether this result in more sites that the 6 – 15 year requirement being identified. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| St Modwen Developments                                                         | Agree – no comments.                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| Hartlepool Borough Council                                                     | Agree – no comments.                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| Barratt Homes                                                                  | BDW agree that no change is needed to the existing SHLAA approach.                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| NLP                                                                            | No comments.                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| Gladman                                                                        | No comments.                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| Cussins                                                                        | Agree – no comments.                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| Stockton BC                                                                    | Agree – no comments.                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| Bussey & Armstrong Ltd                                                         | Agree – no comments.                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| Item 23: Updating evidence on the 5 year supply.                               |                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| Prism Planning                                                                 | Agree – no comments.                                                                                                                                                                                                                                                                                                                                   | 8 respondents either agreed, did not respond or had no comments to make. 2 respondents disagreed. Those disagreeing commented that the Council must consider its five year supply on the basis of its full OAN, apply 5% buffer and deal with under delivery and only include sites that are deliverable.<br><br><b>Response:</b><br>The approach suggested is what the Council will be doing, except for underdelivery – an up to sate OAN                                                                                         | Once available, the Council will use the OAN to calculate its 5 years supply and apply a 5% buffer. |
| Taylor Wimpey                                                                  | Disagree - In light of the Gladman appeal decision the Council must now consider its 5 year housing land supply on the basis of the its full OAN, dealing with past under-delivery, imposing an appropriate NPPF buffer and only including sites in the supply that are deliverable.                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| St Modwen Developments                                                         | Disagree - The Council must now consider its 5 year housing land supply position in light of the Gladman appeal decision and an assessment of its full OAN.                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| Hartlepool Borough Council                                                     | Agree – no comments.                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |
| Barratt Homes                                                                  | BDW agree that no change is needed to the existing SHLAA approach.                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |



| Agent/Developer                                 | Comments Made                                                                                                                                                                                                                                                                                                                                                                              | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Change to methodology                                                                               |
|-------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
| NLP                                             | No comments.                                                                                                                                                                                                                                                                                                                                                                               | negates the need to consider previous under delivery, as any unmet needs arising from this will be picked up as outstanding needs in the OAN numbers for the coming years.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                     |
| Gladman                                         | No comments.                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                     |
| Cussins                                         | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                     |
| Stockton BC                                     | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                     |
| Bussey & Armstrong Ltd                          | No response.                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                     |
| Item 24: Dealing with past undersupply.         |                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                     |
| Prism Planning                                  | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                       | 7 respondents agreed or made no comments, 2 disagreed and one commented that the Council must ensure there is a 5 year supply of sites +5% buffer.<br>Those disagreeing made the same comment that the 5 year supply should include addressing historic shortfall in the short term, and suggest the 5 year housing requirement is: OAN figure + past under-delivery + appropriate NPPF buffer.<br><br><b>Response:</b><br>The Council is commissioning work to prepare an up to date objective assessment of housing needs, using CLG household projection data to be published in late February 2015. This will negate the need to consider previous under delivery as any unmet needs arising from this will be picked up as outstanding needs in the OAN numbers for the coming years.<br><br>One the OAN is known, the Council will calculate its 5 years supply with a 5% buffer. | Once available, the Council will use the OAN to calculate its 5 years supply and apply a 5% buffer. |
| Taylor Wimpey                                   | Disagree - The Council must seek to identify enough deliverable sites to meet their 5 year housing land requirement including addressing any historic shortfall in the short term as required by NPPG and stated by the Inspector in the Gladman appeal.<br>The 5 year housing requirement is:<br>OAN figure + past under-delivery + appropriate NPPF buffer = 5 year housing requirement. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                     |
| St Modwen Developments                          | Disagree - The Council must seek to identify enough deliverable sites to meet their 5 year housing land requirement including addressing any historic shortfall in the short term as required by NPPG and stated by the Inspector in the Gladman appeal.<br>The 5 year housing requirement is:<br>OAN figure + past under-delivery + appropriate NPPF buffer = 5 year housing requirement. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                     |
| Hartlepool Borough Council                      | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                     |
| Barratt Homes                                   | In the recent appeal decision at Middleton St George, the Inspector stated ‘...I am not persuaded that it is appropriate to apply a buffer greater than 5%’. Therefore the Council must ensure it has sufficient sites to fulfil the objectively assessed need plus the 5% buffer.                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                     |
| NLP                                             | No comments.                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                     |
| Gladman                                         | No comments.                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                     |
| Cussins                                         | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                     |
| Stockton BC                                     | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                     |
| Bussey & Armstrong Ltd                          | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                     |
| Item 25: Dealing with housing for older people. |                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                     |
| Prism Planning                                  | Agree- with an aging population this is likely to become an                                                                                                                                                                                                                                                                                                                                | 6 respondents agreed or had no                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Clearly set out                                                                                     |



| Agent/Developer            | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                 | Change to methodology                                          |
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|                            | increasingly important factor.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                |
| Taylor Wimpey              | Disagree - Residential institutions (Use Class C2) should only be included within the suggested supply if the need for such accommodation is explicitly considered as part of the full OAN figure going forward.<br>On this basis, it is not appropriate for this type of accommodation to be retrospectively considered in the context of housing completion over previous years.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | comments to make.<br>2 disagreed and 2 made comments. Comments made were that any additional completions from this source should not be added retrospectively to previous years because they should only be counted if specific needs are identified in the OAN, and an appeal decision is provided to support this view. Also, that any proposed approach agreed should be set out clearly in the Local Plan and SHLAA methodology. | approach to counting C2 in SHLAA and local plan methodologies. |
| St Modwen Developments     | Disagree - Residential institutions (Use Class C2) should only be included within the suggested supply if the need for such accommodation is explicitly considered as part of the FOAN figure going forward.<br>On this basis, it is not appropriate for this type of accommodation to be retrospectively considered in the context of housing completion over previous years.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                |
| Hartlepool Borough Council | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                |
| Barratt Homes              | BDW agree that the proposed approach is much more robust. The council must ensure that the agreed approach is set out clearly in the Local Plan and SHLAA methodology.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                |
| NLP                        | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                |
| Gladman                    | The Council seeks to assert whether C2 housing is a significant source of the housing supply and whether it can be retro-fitted into previous years housing delivery. Gladman object to this approach as it inconsistent with the requirements of PPG, whilst PPG recognises at paragraph 037 (Reference ID: 3-037) that older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan. Whilst PPG does not provide how local planning authorities should count housing provided for older people, it emphasises that such an approach should be clearly set out in the Local Plan. This is supported by a recent appeal decision for land to the west of Close Lane and north of Crewe Road, Alsager (Appeal Ref: App/R0660/A/13/2203282) in which the Inspector states, 'While I concur with both the Council and the appellants that housing provided for older people, including residential institutions in Use | <b>Response:</b><br>The information and evidence provided is noted and will be relayed to the Steering Group to inform its decision on the appropriate approach to this.<br>At this time, the Council is not clear on how the need for this accommodation could be identified and disaggregated from the overall housing needs work.                                                                                                 |                                                                |

| Agent/Developer                                                                       | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Change to methodology |
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|                                                                                       | Class C2, should be counted against the housing requirement, the approach taken should be determined as part of the Local Plan process.' The inspector concludes that, 'although the Use Class C2 and student accommodation should be counted against the Council's housing requirement, there is no substantial evidence before me to support the level of such provision to be included in any calculation of housing land supply.<br>The above clearly demonstrates that the Council cannot retrofit the delivery of C2 dwellings unless the housing policies contained in the Core Strategy address this source of supply, which it does not. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Cussins                                                                               | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Stockton BC                                                                           | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Bussey & Armstrong Ltd                                                                | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Item 26: How should local planning authorities deal with student housing?             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Prism Planning                                                                        | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 9 responses agreed or made no comments. One commented that whilst student housing is not a significant issue, the methodology should include some consideration of the amount of accommodation it releases in the market.<br><br><b>Response:</b><br>Student housing is not a significant issue- most of the students at college or University in Darlington are home based, split between those living in existing households within the Borough and those commuting in from households outside of the Borough. | None.                 |
| Taylor Wimpey                                                                         | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| St Modwen Developments                                                                | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Hartlepool Borough Council                                                            | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Barratt Homes                                                                         | BDW recognise that student housing is not a significant issue in the borough. Nevertheless, there should be some consideration in the SHLAA methodology to the inclusion of student accommodation towards the housing requirement, based on the amount of accommodation it releases in the housing market.                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| NLP                                                                                   | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Gladman                                                                               | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Cussins                                                                               | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Stockton BC                                                                           | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Bussey & Armstrong Ltd                                                                | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Item 27: How should local planning authorities deal with empty housing and buildings? |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| Prism Planning                                                                        | Agree- no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 9 responses agreed or made no comments. One suggested that the Council needs an empty homes strategy.<br><br><b>Response:</b>                                                                                                                                                                                                                                                                                                                                                                                    | No change             |
| Taylor Wimpey                                                                         | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |
| St Modwen Developments                                                                | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                       |

| Agent/Developer                                                  | Comments Made                                                                                                                                                                                                                                                                                                                    | DBC Officer Comments                                                                                                                                                                                                                                                         | Change to methodology                                                                  |
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| Hartlepool Borough Council                                       | Agree – no comments.                                                                                                                                                                                                                                                                                                             | The Council has an empty homes strategy, <a href="http://www.darlington.gov.uk">www.darlington.gov.uk</a> , and is proactive in getting empty homes back into use. Where this happens, these are not counted as new dwellings, to avoid double counting.                     |                                                                                        |
| Barratt Homes                                                    | The council need to implement an Empty Homes Strategy. The council would have to demonstrate that empty homes had not been counted within their existing stock of dwellings when calculating their overall need for additional dwellings.                                                                                        |                                                                                                                                                                                                                                                                              |                                                                                        |
| NLP                                                              | No comments.                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                              |                                                                                        |
| Gladman                                                          | No comments.                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                              |                                                                                        |
| Cussins                                                          | Agree – no comments.                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                              |                                                                                        |
| Stockton BC                                                      | Agree – no comments.                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                              |                                                                                        |
| Bussey & Armstrong Ltd                                           | Agree – no comments.                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                              |                                                                                        |
| Item 28: Relationship of 5 year supply to neighbourhood planning |                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                              |                                                                                        |
| Prism Planning                                                   | Agree – no comments.                                                                                                                                                                                                                                                                                                             | 9 responses agreed or made no comments. One agreed with the suggestion to consult neighbourhood planning groups.<br><br><b>Response:</b><br>The Council has consulted neighbourhood planning groups to see if they have any sites to include for consideration in the SHLAA. | No change.                                                                             |
| Taylor Wimpey                                                    | Agree- no comments.                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                              |                                                                                        |
| St Modwen Developments                                           | Agree – no comments.                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                              |                                                                                        |
| Hartlepool Borough Council                                       | Agree – no comments.                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                              |                                                                                        |
| Barratt Homes                                                    | BDW agree with the councils proposed approach to seek suggestions for sites to be assessed from preparing neighbourhood plans. The council must involve groups involved in the preparation of the neighbourhood plans in the SHLAA steering group, to include them in the SHLAA preparation and ensure they are consulted on it. |                                                                                                                                                                                                                                                                              |                                                                                        |
| NLP                                                              | No comments.                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                              |                                                                                        |
| Gladman                                                          | No comments.                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                              |                                                                                        |
| Cussins                                                          | Agree – no comments.                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                              |                                                                                        |
| Stockton BC                                                      | Agree – no comments.                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                              |                                                                                        |
| Bussey & Armstrong Ltd                                           | No response.                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                              |                                                                                        |
| Item 29: Frequency of update                                     |                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                              |                                                                                        |
| Prism Planning                                                   | Agree – no comments.                                                                                                                                                                                                                                                                                                             | 9 responses agreed or made no comments. One responded that the SHLAA must be updated annually, not about annually.<br><br><b>Response:</b> the Council will aim to prepare the SHLAA update at least                                                                         | Revise methodology to indicate that the Council will aim to update the SHLAA annually. |
| Taylor Wimpey                                                    | Agree- no comments.                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                              |                                                                                        |
| St Modwen Developments                                           | Agree – no comments                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                              |                                                                                        |
| Hartlepool Borough Council                                       | Agree – no comments.                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                              |                                                                                        |

| Agent/Developer                                               | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Change to methodology             |
|---------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| Barratt Homes                                                 | The council states that the SHLAA is updated 'about' annually. The council must ensure the update is conducted annually a 5 year supply of specific deliverable sites for housing.                                                                                                                                                                                                                                                                                                                                                              | annually. The preparation of this SHLAA was delayed for pragmatic reasons – to await the outcome of the Gladman appeal, as this would inform the Council's SHLAA work going forward.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                   |
| NLP                                                           | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| Gladman                                                       | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| Cussins                                                       | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| Stockton BC                                                   | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| Bussey & Armstrong Ltd                                        | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| Item 30: What information should be recorded when monitoring? |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| Prism Planning                                                | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 8 respondents agreed or made no comments, two disagreed. Both suggested that planning permission data is not collected and should be, and one asked the Council to review its whole approach to demonstrating 5 years land supply, in light of the Gladman appeal decision.<br><br><b>Response:</b><br>Data on sites with planning permission is collected and reported in the SHLAA – e.g. see Section 6 of Update 5.<br>This methodology review is one part of the Council's process of reviewing its approach to demonstrating 5 years land supply. It is also commissioning work to establish the objectively assessed needs for the housing market area and to undertake a Strategic Housing Market Assessment to bring that data up to date. | As detailed in this column above. |
| Taylor Wimpey                                                 | Disagree - The current approach does not encompass all the matters identified in NPPG as suggested at Item 6 which states that annual completion data is not collected from sites with planning permission. Therefore point one listed at Item 30 is not satisfied.                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| St Modwen Developments                                        | Disagree - The current approach does not encompass all the matters identified in NPPG as suggested at Item 6 which states that annual completion data is not collected from sites with planning permission. Therefore point one listed at Item 30 is not satisfied. St Modwen have raised concerns consistently over the Council's approach to calculating whether they can demonstrate a 5 year supply and trust that the Council will fully take note of the Inspectors conclusions and undertake future assessments in a more robust manner. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| Hartlepool Borough Council                                    | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| Barratt Homes                                                 | The BDW agree that no change is needed to the existing approach.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| NLP                                                           | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| Gladman                                                       | No comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| Cussins                                                       | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| Stockton BC                                                   | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| Bussey & Armstrong Ltd                                        | Agree – no comments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| Other matters                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| Barratt Homes                                                 | Asked what the Council's answers are to two questions posed in MPPG but not reflected in the consultation, viz:                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Response:</b> at this time, the Council sees no reason why it would not seek                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | None.                             |

| Agent/Developer | Comments Made                                                                                                                                                                                                                                                                                                                                                                                                        | DBC Officer Comments                                                                                                                                                                                                                                                                                                                                                                                                                                             | Change to methodology                                                                |
|-----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
|                 | <ul style="list-style-type: none"> <li>Do local planning authorities have to meet in full housing needs identified in needs assessments?</li> <li>How is deliverability (1-5 years) and developability (6-15 years) determined in relation to housing supply?</li> </ul>                                                                                                                                             | <p>to meet in full the housing needs identified in the needs assessment. Depending on how high they are, there may be question marks over the house building industry's appetite or capacity to deliver the required amount of new housing within the plan period.</p> <p>The answer to Q2 is covered in the questions posed in the consultation and in the responses given above.</p>                                                                           |                                                                                      |
| NLP Planning    | <p>Disagree with the Council's approach to accord with PPG only where appropriate. PPG says that plan makers must set out reasons if they depart from the guidance. Do not consider local circumstances or 'where the overall aims of the SHLAA process will not be affected' to be reasons to deviate.</p> <p>The SHLAA will be more robust and less challengeable if the Council sticks to the PPG methodology</p> | <p><b>Response:</b> Disagree. The fact that the PPG says what LPAs should do if they do deviate indicates that there may be circumstances where this is appropriate. The circumstances cited seem reasonable. The Council has to balance according with PPG against the resources available to complete the task in a reasonable time. .</p>                                                                                                                     | None.                                                                                |
| Gladman         | Any departure from the explicit guidance provided by PPG needs to be set out and justified by the Council.                                                                                                                                                                                                                                                                                                           | <p><b>Response:</b> this is the Council's intention.</p>                                                                                                                                                                                                                                                                                                                                                                                                         | No change.                                                                           |
| Gladman         | The SHLAA should be carried out once the OAN has been established. The Council needs to prepare its OAN and undertake a SHMA as soon as possible.                                                                                                                                                                                                                                                                    | <p><b>Response:</b> The Council accepts that the SHLAA cannot be completed until the OAN has been established, but wants to be in an advanced position to complete any final work required on the SHLAA as soon as the OAN is known.</p> <p>It is currently commissioning work to understand its OAN, and expects the initial findings to be known in late Spring. The SHMA will be part of the same commission, but is expected to take longer to complete.</p> | Need to extent timetable for preparation to extend beyond the OAN findings due date. |
| Gladman         | The Council should take account of the Gladman appeal Inspector's decision in respect of taking into account potential delays to housing delivery to provide infrastructure, and the potential legal challenges that may need to be overcome before unallocated sites are brought forward.                                                                                                                           | <p><b>Response:</b> By working with the promoters of sites, the Council has first hand information about the lead in times for major new developments being planned.</p> <p>All proposed housing sites attract</p>                                                                                                                                                                                                                                               | None.                                                                                |

| Agent/Developer | Comments Made | DBC Officer Comments                                                                                                                                                                                                                                                                                                                | Change to methodology |
|-----------------|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
|                 |               | objections, often vociferous local opposition. Provided that the Council has robust and transparent well evidenced reasons for the site allocations it is making, and it can accommodate some of the concerns people raise through setting out the planning requirements for each site, these should not generally be showstoppers. |                       |
|                 |               |                                                                                                                                                                                                                                                                                                                                     |                       |

## SHLAA Update 6: Winter 2014/15

## COMPARING NATIONAL GUIDANCE WITH EXISTING SHLAA APPROACH AND 2015 APPROACH

| Item no. | Matter                                                                                  | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                                                                                                  | 2013 Approach                                                                                                                                                                                                                                                                                                                                                                                                | 2015 Approach                                                                                                                                                                                                                                                                                                                 |
|----------|-----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.       | Geographical area covered by the assessment.                                            | NPPG says that it should be the housing market area and functional economic area.<br><br>Revision date: 06 03 2014<br>Paragraph: 008 Reference ID: 3-007-20140306                                                                                                                                                                                                | Darlington Borough, as over 70% of all house moves were within the Borough,                                                                                                                                                                                                                                                                                                                                  | <ul style="list-style-type: none"> <li>Darlington Borough, which evidence indicates is the housing market area.</li> </ul>                                                                                                                                                                                                    |
| 2        | Who should plan makers work with?                                                       | NPPG suggests the process should involve developers; those with land interests; land promoters; local property agents; local communities; partner organisations; LEP's; businesses; parish and town councils; Neighbourhood forums preparing Neighbourhood Plans.<br><br>Revision date: 06 03 2014<br>Paragraph: 009 Reference ID: 3-008-20140306                | Steering Group currently comprises representatives of all groups indicated in NPPG, except local property agents, the local community, Parish Councils or neighbourhood forums, LEPs and businesses.                                                                                                                                                                                                         | <ul style="list-style-type: none"> <li>Process involves all NPPG suggested parties except the local community, Parish Councils, and neighbourhood forums through representatives on a SHLAA Steering Group. The LEP was invited but declined.</li> <li>Neighbourhood planning groups were invited to submit sites.</li> </ul> |
| 3        | Should the assessment be constrained, e.g. by site size or by the need for development? | NPPG says it should identify all sites and broad locations regardless of the amount of development needed.<br><br>Revision date: 06 03 2014<br>Paragraph: 010 Reference ID: 3-009-20140306<br><br>All sites that can deliver 5 or more dwellings should be considered. Plan makers can consider alternative site size thresholds.<br>(Para 011, 3-010-20140306 ) | All sites of more than 5 dwellings or 0.17ha or more are included in the assessment, even if there is known policy or other constraints.<br><br>More proactive and detailed information collection and updating is carried out on sites that best accord with the locational strategy, set out in Policy CS1 of the adopted LDF Core Strategy. Different combinations of adjacent sites are also considered. | <ul style="list-style-type: none"> <li>As per existing approach.</li> </ul>                                                                                                                                                                                                                                                   |
| 4        | How should sites be identified & data sources used to ascertain                         | NPPG says by desk top review, including existing sites that can be improved, intensified or changed. It lists sources of data that may be relevant.                                                                                                                                                                                                              | The Council is aware of all the sources of data listed in NPPG and draws on them as appropriate.                                                                                                                                                                                                                                                                                                             | <ul style="list-style-type: none"> <li>As per existing approach, plus the Council actively identifies sites through the desktop review process.</li> </ul>                                                                                                                                                                    |



| Item no. | Matter                                                     | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                                                 | 2013 Approach                                                                                                                                                                                                                                                                                                                                                                                                           | 2015 Approach                                                                                                                                                                                                                                                                                                                                                                                   |
|----------|------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | info?                                                      | <p>Constraints should be clearly identified, and revisited to see if they can be overcome.</p> <p>Actively identify sites &amp; make a wide call for sites, setting out the key information required.</p> <p>Revision date: 06 03 2014<br/>Paragraph: 011, 012 , 013, reference ID 3-011, 012, 013-20140306</p> | <p>Sites can be submitted for consideration in the SHLAA at any time, and a form is available permanently on the Council's website for this purpose.</p> <p>The Council also regularly reviews its own land, and identifies further sites for the SHLAA as a result of pre-application and other enquires received, and responses to local plan consultations.</p>                                                      |                                                                                                                                                                                                                                                                                                                                                                                                 |
| 5.       | Which sites should be included in the site survey?         | <p>NPPG says the ones that have reasonable potential for development, taking account of national policies and designations.</p> <p>Revision date: 06 03 2014<br/>Paragraph: 014 Reference ID: 3-014-20140306</p>                                                                                                | <p>Site survey is carried out on all sites, but more proactive and detailed information collection and updating is carried out on sites that best accord with the locational strategy, set out in Policy CS1 of the adopted LDF Core Strategy.</p> <p>Monitoring information, a telephone survey and intelligence of the SHLAA Steering Group provide the up to date information on sites with planning permission.</p> | <ul style="list-style-type: none"> <li>As per existing approach</li> </ul>                                                                                                                                                                                                                                                                                                                      |
| 6        | What characteristics should be recorded during the survey? | <p>NPPG sets out a range of site characteristics that should be recorded.</p> <p>Paragraph: 016 Reference ID: 3-016-20140306<br/>Revision date: 06 03 2014</p>                                                                                                                                                  | <p>The existing approach captures all the information indicated in NPPF, except that for sites with planning permission, it only records that a site has started, and not how many unit. We also do not record whether ground works are completed.</p> <p>The existing approach treats sites with planning permission differently to those without.</p>                                                                 | <ul style="list-style-type: none"> <li>The 2015 approach captures all the information indicated in the NPPG. In future, DBC will contact house builders on sites of 6 dwellings or more to find out if/ when ground works are expected to be completed, plus for sites with planning permission, DBC will identify the number of units started as part of the trajectory information</li> </ul> |
| 7        | How should development potential be calculated?            | <p>Locally determined policies, including density, taking into account site characteristics &amp; physical constraints. Assessing achievability (including viability) and suitability can usefully be carried out in parallel.</p>                                                                              | <p>Key local policy constraints are recorded for each site, referring to the adopted Core Strategy and other locally agreed documents, such as the Green Infrastructure Strategy.</p> <p>The Council's Design of New</p>                                                                                                                                                                                                | <ul style="list-style-type: none"> <li>As per existing approach.</li> </ul>                                                                                                                                                                                                                                                                                                                     |



| Item no. | Matter                                                                                                   | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2013 Approach                                                                                                                                                                                                                                                                                                                                                                                            | 2015 Approach                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------|----------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                                                                                          | Revision date: 06 03 2014<br>Paragraph: 018 Reference ID: 3-017-20140306                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Development SPD, and any physical constraints are also identified for the site. The Council's Urban Design Officer sketches an indicative layout based on this to establish a realistic site capacity, which is considered and agreed (or not) by the SHLAA Steering Group, alongside their consideration of viability and policy constraints.                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 8        | What factors should be considered for when and whether sites/broad locations are likely to be developed? | Should assess the suitability, availability and achievability, including whether the site is economically viable.<br>Revision date: 06 03 2014<br>Paragraph: 018 Reference ID: 3-018-20140306                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Suitability, availability and achievability, including whether the site is economically viable, are all considered in the current approach, with information prepared and presented to the SHLAA Steering Group, who add to the information with their own market intelligence and site information.                                                                                                     | <ul style="list-style-type: none"> <li>As per existing approach</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                         |
| 9        | What factors should be considered when assessing suitability?                                            | Should consider the types of development that may meet needs of community i.e. market housing, private rented affordable housing, self-build plots, and should be guided by local plan policies and how up to date they are, market requirements. Sites with planning permission are generally considered suitable for development, unless circumstances have changed to alter that. Suitability considerations should also include physical constraints, potential impacts on the environment and to neighbours if development proceeded, likely market attractiveness, and contribution to regeneration priorities.<br><br>Revision date: 06 03 2014<br>Paragraph: 019 Reference ID: 3-019-20140306 | SHLAA steering group meeting provides forum for different parts of the market to comment on whether sites are suitable for their markets, and for different types of development.<br><br>Market requirements are accommodated as far as is possible within the spatial framework set out in the adopted Core Strategy.<br><br>All the factors identified in NPPG are considered in the existing process. | <ul style="list-style-type: none"> <li>As per existing approach, plus give more explicit consideration as to whether sites could be suitable for self-build plots, e.g. these could be sites that are suitable and available, but for which no volume house builder is currently known to have an interest, and/or could be small infill sites. Also, the Steering Group will be reconvened to look at any new sites that are identified as a result of the OAN number.</li> </ul> |
| 10       | What factors should be considered when assessing                                                         | Sites are considered available if there is confidence of no legal or ownership problems, generally with a landowner/developer who has expressed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Gather information from landowner/promoter of site & establish land ownership & carry out legal and land searches to establish situation, if any                                                                                                                                                                                                                                                         | <ul style="list-style-type: none"> <li>As per existing approach</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                         |

| Item no. | Matter                                                                                                   | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                     | 2013 Approach                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2015 Approach                                                                                                                                                                                                                                                                                                                       |
|----------|----------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | availability?                                                                                            | an intention to develop/sell. Consideration should be given to delivery record, e.g. unimplemented permissions, of developers and landowners putting forward sites.<br><br>Revision date: 06 03 2014<br>Paragraph: 020 Reference ID: 3-020-20140306                                 | doubt.<br><br>Delivery record of developer/landowner not currently considered.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                     |
| 11       | What factors should be considered when assessing achievability Including whether development is viable?  | NPPG reiterates NPPF regarding achievability. It suggests economic viability and the capacity of the developer to complete and let/sell the development over a certain period are key factors. (Para 21, 3-021-20140306)                                                            | Detailed viability assessments of each site are not carried out, as this would be resource prohibitive. Instead, the local market knowledge of the SHLAA Steering Group is tapped to make this assessment, alongside information about whether sites are in high or low value parts of the Borough, and whether sites, such as Council owned land, could come forward at less than full market value. Capacity of developers to complete is determined by the Steering Group with reference to past annual build out rates on large and small sites and any economic factors that may mean this could be different going forward. | <ul style="list-style-type: none"> <li>As per existing approach, plus more detailed site assessments will be published as an appendix to the SHLAA, as well as summaries about site constraints included within the document.</li> </ul>                                                                                            |
| 12       | What happens when constraints are identified that impact on suitability, availability and achievability? | NPPG suggests considering the action needed to remove constraints, and when, how, and likelihood of this being achieved. (Para 22, 3-022-20140306)<br>Revision date: 06 03 2014                                                                                                     | Action needed is identified and recorded.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <ul style="list-style-type: none"> <li>As per existing approach, plus add timing and likelihood of constraint being overcome.</li> </ul>                                                                                                                                                                                            |
| 13       | How should timescale & rate of development be assessed & presented?                                      | Indicative lead in times & build out rates for different scale & types of site. Allow for more than one developer on large sites. Draw on advice of developers and local agents to assess lead in times and build out rates. (Para 23, 3-023-20140306)<br>Revision date: 06 03 2014 | Telephone survey establishes build out rates and lead in times on small and larger sites, where possible. Generic assumptions agreed with Steering Group applied to those for which specific information is not available. Deadlines for spending funding on RSL schemes is also taken into consideration.                                                                                                                                                                                                                                                                                                                        | <ul style="list-style-type: none"> <li>As per existing approach, plus local property agent have been added to the Steering Group. Steering Group suggested 60 dpa build out rate for sites with multiple developers. HBF will be contacted to see if an update to 2008 letter regarding build out rates can be provided.</li> </ul> |
| 14       | Determining                                                                                              | Compelling evidence required if windfall                                                                                                                                                                                                                                            | The Council reports a time series of past                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <ul style="list-style-type: none"> <li>As per existing approach</li> </ul>                                                                                                                                                                                                                                                          |

| Item no. | Matter                                                                                                                                                                                                  | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                                                                                             | 2013 Approach                                                                                                                                                                                                                                                                                                                                                                                           | 2015 Approach                                                                                                                                                                                                  |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | windfall allowance.                                                                                                                                                                                     | allowance is included in 5 year supply. LPA's can identify windfalls from broad locations for years 6-15.<br>(Para 24, 3-024-20140306)<br>Revision date: 06 03 2014                                                                                                                                                                                         | windfall data back to 2006 (excluding garden land) to justify its proposed windfall allowance to the SHLAA Steering Group.                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                |
| 15       | How should the assessment be reviewed?                                                                                                                                                                  | The development potential of all sites can be collected to produce an indicative trajectory. An overall risk assessment should be made as to whether sites will come forward as anticipated.<br><br>(Para 25, 3-025-20140306)<br>Revision date: 06 03 2014                                                                                                  | The headline figures for all sources of supply are recorded for each year in tables in the SHLAA, and the projected first 5 years delivery is set out for sites without planning permission. No risk assessment is explicitly included.                                                                                                                                                                 | <ul style="list-style-type: none"> <li>As per existing approach.</li> </ul>                                                                                                                                    |
| 16       | What if the trajectory indicates there is not enough supply to meet the objectively assessed need? If more land is needed, what is the balance between housing need and constraints on the use of land. | The assessment should be revisited to see if any assumptions could be changed to release more supply. If not, consideration will need to be given to how this shortfall should be best planned for.<br><br>(Para 26, 3-026-20140306, and Para 44, 3-044-20140306, and Para 45, 3-045-20140306)<br>Revision dates: 06 03 2014 (26) and 06 10 2014(44 and 45) | This circumstance has not arisen previously. The SHLAA Steering group would be recalled if there was a shortfall, to consider the evidence further, and further investigations would be made into whether Council owned land could be released earlier, and whether there was any flexibility in the policy constraints identified, taking into account the policies of the NPPF considered as a whole. | <ul style="list-style-type: none"> <li>As per existing approach, plus consideration to the role the Steering Group could play in identifying more land for housing and getting constraints removed.</li> </ul> |
| 17       | Identifying sites or broad locations beyond 5 years.                                                                                                                                                    | This should be done for years 6-15 where possible. Plans can still be found sound if LPAs have not been able to identify these for years 11-15.<br>(Para 27, 3-027-20140306)<br>Revision date: 06 03 2014                                                                                                                                                   | Specific sites are identified up to 2026.                                                                                                                                                                                                                                                                                                                                                               | <ul style="list-style-type: none"> <li>As per existing approach</li> </ul>                                                                                                                                     |
| 18.      | Core outputs                                                                                                                                                                                            | Sets out a list of standard outputs that should be available in a publicly accessible form.<br>(Para 28, 3-028-20140306)<br>Revision date: 06 03 2014                                                                                                                                                                                                       | All sites (except small sites with Planning permission) are listed and identified on maps.<br>A summary of the assessment of each site (except small sites with planning permission), and whether and when it can be realistically developed is included.                                                                                                                                               | <ul style="list-style-type: none"> <li>As per existing approach</li> </ul>                                                                                                                                     |

| Item no. | Matter                                                                      | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 2013 Approach                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 2015 Approach                                                                                                                                                       |
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|          |                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>More detail is included for sites that are more realistic candidates for development. Reasons for discounting others are given.</p> <p>For sites without planning permission, the potential type and quantity, estimated build out rates and how and when constraints can be overcome is set out in a single table.</p> <p>An indicative trajectory on a site by site basis is only provided for sites without planning permission.</p> <p>The final SHLAA is published on the Council's website, as soon as possible after its completion.</p> |                                                                                                                                                                     |
| 19       | Determining deliverability and developability in relation to housing supply | <p>Need to determine in accordance with the definitions in footnote 11 and 12 of NPPF. (Para 29, 3-029-20140306)</p> <p>Revision date: 06 03 2014</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | NPPF footnotes are applied to determine this, but may need to say this explicitly in the document/methodology.                                                                                                                                                                                                                                                                                                                                                                                                                                     | <ul style="list-style-type: none"> <li>As per existing approach</li> </ul>                                                                                          |
| 20.      | Starting point for 5 year supply.                                           | <p>Housing requirements in an up to date adopted local plan should be used as the starting point for calculating 5 year supply. Such plans should be given considerable weight unless new evidence has come to light. Evidence that is drawn from revoked regional strategies may not adequately reflect current needs. If local plan figures are not appropriate to use, information in the latest full assessments of housing needs should be considered.</p> <p>Where there is no robust recent assessment, CLG household projections should be used, but the weight given to these should take account of the fact they have not been tested.</p> <p>(Para 30, 3-030-20140306)</p> <p>Revision date: 06 03 2014</p> | <p>Since 2011, the updates to the SHLAA have relied on the Core Strategy housing requirement to assess the 5 year land supply position.</p> <p>The Inspectors report into the appeal by Public Inquiry of Gladman homes against the Council's decision to refuse its application for 250 dwellings at Middleton St. George may give cause to consider this.</p>                                                                                                                                                                                    | <ul style="list-style-type: none"> <li>The benchmark against which the 5 year supply will be measured will be based on the OAN as soon as this is known.</li> </ul> |
| 21       | What constitutes                                                            | Can include sites allocated in an adopted                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Where possible, information is obtained                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>As per existing approach, plus</li> </ul>                                                                                    |

| Item no. | Matter                                                                | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                                                                                                                                                                                                               | 2013 Approach                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 2015 Approach                                                                                                                                                                       |
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|          | a deliverable site in the context of housing policy?                  | <p>plan and sites with planning permission, unless clear evidence sites will not come forward.</p> <p>Sites without planning permission can be included if there is deliverability evidence, and no infrastructure constraints.</p> <p>Evidence/method needs to be robust and transparent.</p> <p>(Para 31, 3-031-20140306)<br/>Revision date: 06 03 2014</p>                                                                                                                 | <p>direct from developers and landowners for small and large sites to ascertain delivery prospects for allocated sites and sites with planning permission.</p> <p>The current approach also includes sites without planning permission where there is evidence of deliverability, and no infrastructure constraints, and takes account of lead in times for larger sites.</p> <p>A review with SHLAA Steering Group is carried out, to examine the assumptions used about lead in times for developing out different sizes of sites.</p> | <p>discussion with Steering Group on how to moderate the industry's own forecasts on deliverability of sites without planning permission, to make SHLAA more realistic.</p>         |
| 22       | What constitutes a developable site in the context of housing policy? | <p>There should be a reasonable prospect that it will be available and could be viably developed at the point envisaged in years 6-15.</p> <p>Para 32, 3-032-20140306)<br/>Revision date: 06 03 2014</p>                                                                                                                                                                                                                                                                      | <p>Evidence collected on each site is presented to the SHLAA Steering Group which considers it and agrees/amends the Council's draft conclusions, using their local market knowledge and intelligence.</p>                                                                                                                                                                                                                                                                                                                               | <ul style="list-style-type: none"> <li>As per existing approach.</li> </ul>                                                                                                         |
| 23       | Updating evidence on the 5 year supply.                               | <p>LPAs must identify and update the 5 year land supply each year, considering delivery against the forecast trajectory and the deliverability of all sites identified. An annual thorough approach provides a strong position to demonstrate 5 year supply.</p> <p>Para 33, 3-033-20140306)<br/>Revision date: 06 03 2014</p>                                                                                                                                                | <p>The Council does this and includes any new sites identified by itself and others on an annual basis</p>                                                                                                                                                                                                                                                                                                                                                                                                                               | <ul style="list-style-type: none"> <li>As per existing approach, plus once available, the Council will use the OAN to calculate its 5 year supply and apply a 5% buffer.</li> </ul> |
| 24       | Dealing with past undersupply.                                        | <p>Whether there has been persistent under delivery is a matter of judgement, there is no 'universally applicable test' to quantify it, and the issues are likely to be locally unique.</p> <p>Analysis of delivery record is likely to be more robust if a longer view is taken, to take account of peaks and troughs in the housing market.</p> <p>A LPA should aim to deal with any undersupply within the first 5 years of the plan period where possible. If not, it</p> | <p>The SHLAA currently doesn't cover these matters. They are dealt with in housing technical papers associated with the preparation of the Making and Growing Places DPD.</p>                                                                                                                                                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>As per existing approach, plus once available, the Council will use the OAN to calculate its 5 year supply and apply a 5% buffer.</li> </ul> |

| Item no. | Matter                                                                       | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                                                                                                 | 2013 Approach                                                                                                                                                                                                                                                                    | 2015 Approach                                                                                                               |
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|          |                                                                              | should work with neighbouring authorities under 'duty to cooperate'.<br>Para 35, 3-035-20140306)<br>Revision date: 06 03 2014                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                  |                                                                                                                             |
| 25       | Dealing with housing for older people.                                       | Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement.<br><br>(Revision date: 06 03 2014<br>Paragraph: 037 Reference ID: 3-037-20140306)                                                                                                             | Only self-contained C2 units have been counted to date.                                                                                                                                                                                                                          | <ul style="list-style-type: none"> <li>Set out an approach to counting C2 in SHLAA and local plan methodologies.</li> </ul> |
| 26       | How should local planning authorities deal with student housing?             | All types of student accommodation can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market.<br>(Revision date: 06 03 2014<br>Paragraph: 038 Reference ID: 3-038-20140306)                                                                                                                       | None.                                                                                                                                                                                                                                                                            | None.                                                                                                                       |
| 27       | How should local planning authorities deal with empty housing and buildings? | Any approach to bringing empty homes back into use and counting these against housing need would have to be robustly evidenced by LPA at the independent examination of the draft Local Plan, for example to test the deliverability of the strategy and to avoid double counting.<br>Paragraph: 039 Reference ID: 3-039-20140306)<br>Revision date: 06 03 2014 | Empty homes brought back into use are not counted in the SHLAA, to avoid double counting.<br>The same applies to conversion of other buildings to residential use, which is picked up when prior approvals/planning permission is granted, or as potential sites for assessment. | <ul style="list-style-type: none"> <li>As per existing approach</li> </ul>                                                  |
| 28       | Relationship of 5 year supply to neighbourhood planning                      | The LPA should share evidence used to prepare the local plan, such as the SHLAA. Neighbourhood plans should deliver against objectively assessed needs.<br>Paragraph: 040 Reference ID: 3-040-20140306)<br>Revision date: 06 03 2014                                                                                                                            | The SHLAA evidence is publicly available via the Council's website, and outside of the SHLAA process, communities considering NPs are signposted to it.                                                                                                                          | <ul style="list-style-type: none"> <li>As per existing approach</li> </ul>                                                  |
| 29       | Frequency of update                                                          | Should be annually. Full resurvey only needed if new development plan is being prepared or circumstances change significantly.<br>Paragraph: 041 Reference ID: 3-041-20140306)<br>Revision date: 06 03 2014                                                                                                                                                     | The SHLAA is updated about annually.                                                                                                                                                                                                                                             | <ul style="list-style-type: none"> <li>SHLAA will be updated annually.</li> </ul>                                           |
| 30       | What information                                                             | The NPPG indicates 5 main things to                                                                                                                                                                                                                                                                                                                             | The existing approach encompasses all                                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>As per existing approach</li> </ul>                                                  |

| Item no. | Matter                              | What the NPPF/ NPPG says, (including reference)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2013 Approach                                                                                                                           | 2015 Approach |
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|          | should be recorded when monitoring? | <p>record:</p> <ol style="list-style-type: none"> <li>1. progress on allocated and sites with planning permission;</li> <li>2. which SHLAA sites/locations now have planning applications/permissions</li> <li>3. progress on removing constraints on development and changes to deliverability/ developability;</li> <li>4. unforeseen constraints that have emerged, and how they could be addressed;</li> <li>5. Whether the windfall allowances (where justified) is coming forward as expected, or may need to be adjusted.</li> </ol> <p>Paragraph: 041 Reference ID: 3-041-20140306)<br/>Revision date: 06 03 2014</p> | <p>the matters identified in NPPG. This information is all captured and reported in the SHLAA. See 14. above for windfall approach.</p> |               |