

# Newcastle Housing and Economic Land Availability Assessment (HELAA) 2021

February 2022



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## Disclaimer

The policy context for the Housing and Economic Land Availability Assessment (HELAA) is set out in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). In accordance with paragraph 31 of the NPPF local planning authorities should ensure that the preparation and review of all Local Plan policies is based on adequate, up-to-date and relevant evidence. Local Planning Authorities (LPAs) should ensure that their assessment of and strategies for housing, employment and other economic development land uses are integrated, and that they take full account of relevant market and economic signals.

The Government views HELAAs as “a key component of the evidence base to support the delivery of sufficient land for housing to meet the community’s need for more homes”. The NPPF, (para. 67) requires local authorities to “prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period”.

The HELAA does not allocate sites for housing or economic development. That is done through a separate, more detailed planning assessment and consultation, to support the Local Plan. The allocations process determines which sites should be identified for residential development and economic development uses according to which timescale. The methodology behind the allocations process is published alongside this document and the DAP, titled ‘Approach to Housing and Mixed Use Allocations’.

In relation to the information contained within this report, its appendices and any other report relating to the findings of the HELAA: the identification of potential sites, buildings or areas in the HELAA does not state or imply that the councils would necessarily grant planning permission for development. All planning applications will continue to be determined against the appropriate development plan and other relevant material considerations.

The conclusions in the HELAA are based on information that was available at the time of the study and the council does not accept liability for any factual inaccuracies or omissions. The information will be a snapshot of the data captured for HELAA sites submitted at a point in time. Information will be compiled with all due care and attention, however inevitably discrepancies may occur. The document should therefore be considered as a live one that will be updated.

The boundaries to sites, buildings and areas will be based on the information made available at the time by agents and landowners. The HELAA does not limit any amendment of these boundaries for the purposes of a planning application.

# 1. Introduction

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## Background

- 1.1 The Housing and Economic Land Availability Assessment (HELAA), is a technical study that determines the suitability, availability and achievability of land for development. It is an important evidence source to inform plan-making, but does not itself represent policy nor does it determine whether a site should be allocated for future development. Allocations can only be made through the Local Plan.
- 1.2 The process was previously known as the Strategic Housing Land Availability Assessment (SHLAA) and has been renamed as the HELAA to reflect its applicability to other uses in addition to housing; that is, employment, and mixed use.

## What is included in this report?

- 1.3 The HELAA report assesses the development potential of sites submitted to the Council through the HELAA process as well as those previously considered as part of the Strategic Housing Land and Availability Assessment 2013 (SHLAA) and Employment Land Review 2014 and 2018 (ELR). This includes sites in ownership of the Council, public sector land, underused land and buildings.
- 1.4 The HELAA has been prepared in accordance with the National Planning Policy Framework and Planning Practice Guidance (launched on 6 March 2014 with subsequent updates).
- 1.5 This report is structured around the following sections:
  - Section 1 - Introduction
  - Section 2 - Policy Context
  - Section 3 - Assessment methodology – explains the approach and assumptions made when assessing sites.
  - Section 4 - Assessment Findings for housing and employment including:-
    - A calculation of the potential windfall delivery of housing for the City;
  - Section 5 - Calculations of Housing Supply
    - A housing trajectory of anticipated housing development
    - 5 years housing land supply
- 1.6 This report has updates the calculated years starting from 2020/21 (1 April 2020) for the following 15 years, yet seeks to include recent updated information on planning status.

## Purpose of the HELAA:

- 1.7 The purpose of the HELAA is to understand the level of housing and economic land potential within the City and to identify sites which are considered suitable for housing and likely to be developed. Its primary role is to:

- Identify sites with potential for housing or employment uses;
- Assess their suitability for housing or employment uses;
- Identify any constraints to development; and
- Conclude whether suitable sites are deliverable and available for allocation if needed.

1.8 The HELAA informs on the “deliverable” and “developable” aspects of specific sites by providing an information and evidence base, in accordance with the NPPF February 2019 definitions. Its purpose is to collect and collate information that provides a summary of each site’s development potential. The HELAA responds to the requirements of the NPPF and in doing so represents the primary evidence base and monitoring report for all aspects of the City’s housing and economic development land supply. To be of value to the planning process and delivery, the Council is committed to ensuring that the HELAA is a comprehensive evaluation which is reviewed on an annual basis.

1.9 Whilst the HELAA is a key document, it is only one document of the evidence base used to inform the preparation of the Local Plan. It is also important to understand what the HELAA does and does not do. This is presented in Figure 1, below:

<b>What it is</b>	<b>What it is not</b>
<b>A document that informs Local Plan preparation.</b>	A process that allocates land for development
<b>A process for assessing any sites submitted to us for consideration as a future allocation.</b>	A document that grants planning permission or suggests that planning permission should be granted
<b>A document that provides the Council with a general understanding of the development potential of sites.</b>	A Permission in Principle with specific site capacity
<b>A document that presents an indicative housing delivery trajectory up to 2030 plan period based on all sites determined to be deliverable and developable</b>	A document that sets out a phasing plan for delivery up to 2030 and beyond
<b>A process that allows a windfall allowance for housing to be calculated.</b>	A supply of expected windfall sites

Figure 1 Role of the HELAA

## 2. Policy Context

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### National Context

#### National Planning Policy Framework

- 2.1 The policy context for the HELAA is set out in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 2.2 In accordance with paragraph 31 of the NPPF local planning authorities should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local Planning Authorities (LPAs) should ensure that their assessment of land strategies for housing, economic land and other uses are integrated, and that they take full account of relevant market and economic signals.
- 2.3 A national standardised housing need methodology outlines the calculation of housing need based on published projections data. Housing need should be assessed using the Housing Delivery Test, which examines how the housing requirement compares with the number of new homes delivered over the previous three years. Paragraph 75 of the NPPF outlines that local authorities 'should prepare an action plan in line with national planning policy' and set out actions to boost delivery where required. If completions fall below 75% of the figure from 2020 then the presumption in favour of sustainable development will apply. Furthermore, paragraph 73 stipulates that a buffer of 5% should be applied to housing need to ensure choice and competition in the market for land.
- 2.4 The NPPF advocates the efficient and effective use of land, in locations that offer good access to a range of community facilities, key services, economic opportunities and infrastructure. Paragraph 117 emphasises the importance of re-using previously developed land. The NPPF sets out strong guidance on the considerations for setting housing figures, and land availability assessments identify future land supply which is suitable, available and achievable for housing and economic development uses over the plan period.
- 2.5 Local authorities should identify small and medium sites (those up to one hectare in size) to accommodate at least 10% of their housing requirement. Paragraph 34 states that expected development contributions should be outlined in plans, including the 'levels and types of affordable housing required'. Councils should annually identify and update a supply of deliverable sites sufficient to provide 5 years' worth of housing with an additional buffer of 5% to ensure choice and competition. Where there is a persistent record of under delivery (which is not defined in more detail) an additional 20% buffer is required. Beyond the first 5 years the NPPF requires local authorities to 'identify specific, developable sites or broad locations for growth, for 6-10 years and, where possible, for years 11-15'.
- 2.6 To count towards an authority's five year supply sites must be considered to be deliverable. The NPPF defines 'deliverable' as housing sites that are currently available, offer a suitable location for development now, and are achievable with a

realistic prospect that housing will be delivered on the site within five years. Additionally, 'sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years'.

- 2.7 Chapter 12 of the NPPF recognises that high quality buildings and places are important aspects of the development process, and paragraph 130 requires local authorities to 'ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted schemes'. To achieve sustainable development, paragraph 124 specifies that 'being clear about design expectations, and how these will be tested, is essential'.
- 2.8 The NPPF no longer provides an explicit definition of 'economic development'. However for clarity the HELAA defines 'economic development' as development including those within the E Use Classes, public and community uses and main town centre uses (but excluding housing development). This HELAA has focused on an assessment of the potential supply of sites for:
- Offices (formerly B1a/b uses)
  - Industry and warehousing (formerly B1c/B2/B8 uses)

### **Planning Practice Guidance**

- 2.9 The Government's PPG, launched in March 2014, offers practical guidance to support the NPPF.
- 2.10 The section on Housing and Economic Land Availability Assessments sets out that the purpose of such an assessment is to identify a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment of land availability includes the SHLAA requirement as set out in the NPPF.
- 2.11 The PPG states that an assessment should:
- identify sites and broad locations with potential for development;
  - assess their development potential;
  - assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 2.12 The PPG indicates what inputs and processes should lead to a robust assessment of land availability and that plan makers should have regard to the guidance in preparing their assessments. Where they depart from the guidance, plan makers will have to set out reasons for doing so. The assessment should be thorough but proportionate, building where possible on existing information sources outlined within the guidance.



- 2.13 Housing and economic development needs assessments are calculated using national household growth projections for the area of a local authority. This is then adjusted to account for affordability of an area. Where relevant strategic policies were adopted within the last five years, the local housing need figure is capped at 40% above the average annual housing requirement figure set out in the existing policies.
- 2.14 Plans should set out the contributions expected from development informed by evidence of infrastructure, affordable housing need and a proportionate assessment of viability; including setting out the levels and types of affordable housing provision required as well as other infrastructure. A viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the cumulative cost of all relevant policies will not undermine plan deliverability.
- 2.15 The PPG outlines that plan makers can use site typologies to determine viability at the plan making stage. A typology approach is where sites are grouped by shared characteristics such as location, whether brownfield or greenfield, size of site and current and proposed use or type of development. Site specific viability assessments should be undertaken for sites that are critical to delivering the strategic priorities of the plan. Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable.

### **Tyne and Wear and Duty to Cooperate**

- 2.16 The SHLAA Tyne and Wear Partnership was set up in 2008, to enable and coordinate collaborative sub-regional working on the SHLAAs and to ensure an element of sub-regional consistency within the flexibilities provided by the regional guidance. In accordance with the national and regional guidance, a key stakeholder partnership was subsequently established comprising local authority planning and housing officers together with representatives of housebuilders/developers, Registered Providers and private sector consultants and agencies.
- 2.17 This partnership has coordinated the sub-regional approach to the SHLAA in the past and also produced a Tyne and Wear SHLAA Concept Paper. This was developed in order to set out some key assumptions for the sub-region and provide an area-specific guidance note for Tyne and Wear that reflected local conditions. The partnership also led to formation of a Tyne and Wear SHLAA Panel that had a direct input into the methodology of each local authority SHLAA by agreeing the approach taken by each LPA and endorsing the final assessment. This HELAA builds upon principles established during this process.
- 2.18 Providing an adequate supply of land for business and industry is essential for achieving growth across the region. The North of Tyne's portfolio of employment sites needs to provide a range and quantity of sites flexible enough to accommodate changing economic circumstances and respond to market demands, recognising where our strengths lie, while supporting emerging sectors and entrepreneurship within sustainable locations.

- 2.19 Newcastle's Urban Core is a priority location for new office floorspace. It provides a strategic and sustainable location for high-density employment and can cater for a range of business needs and office market segments. The out of town office market is regional, functioning as one market, therefore, the perception of businesses looking to locate in an office park environment in Tyne and Wear will look at availability regionally and are not tied within administrative boundaries. Consequently, given the current environment of economic restraint, the out of town office market remains dominated by the former Enterprise Zone developments of Quorum and Cobalt in North Tyneside, where there is significant availability and incentive packages on offer.
- 2.20 The North East industrial market has experienced significant changes from its traditional reliance on heavy industry of the past to today where there is now a strong presence of domestic, international and global companies who have chosen to locate in Tyne and Wear and Northumberland.
- 2.21 In terms of other market availability, the region has also seen recent resurgence within the oil industry with renewed confidence generating growth. There is a large subsea sector in the North of Tyne area supplying equipment used to recover oil and gas from the seabed. The North East subsea sector serves a global market. The North of Tyne renewable and offshore energy sector has also played its part in encouraging growth, with the North East positioning itself as a focal point for associated business and occupiers supporting the industry.
- 2.22 Under the Duty to Cooperate the council will work with neighbouring authorities where appropriate. All neighbouring authorities were contacted under the Duty to Cooperate to seek their views on the methodology.

### **Newcastle's Local Plan**

- 2.23 Newcastle's Local Plan consists of two parts and is fully comprehensive and is considered to up to date. Together they form the statutory Development Plan for planning decisions.
- 2.24 Part one of the Local Plan is the joint Gateshead and Newcastle Core Strategy and Urban Core Plan, adopted in March 2015. The plan and the strategic policies it contains were reviewed in March 2020 and concluded that the plan continues to provide a valid and up-to-date basis for decision-making, conforming with the provisions of the National Planning Policy Framework, and reflecting local priorities.
- 2.25 Part two of Newcastle's Local Plan is the Development and Allocations Plan (DAP). This document includes detailed development management policies and allocates and designates land. The DAP replaces the Unitary Development Plan (1998), Walker Riverside Area Action Plan (2007) and Benwell Scotswood Area Action Plan (2009). The Inspector's report into the examination of the DAP was published in March 2020 and the local plan was adopted on 24 June 2020.

### **Core Strategy and Urban Core Plan – Local Housing Needs**

- 2.26 NPPF sets a clear requirement for LPAs to significantly boost the delivery of housing and to plan to meet the identified need for new housing. The Government’s national standard local housing need methodology has been published since the CSUCP was adopted, however, the housing needs evidence which underpins the CSUCP requirements was conducted in 2013, and the resulting housing target was reviewed in 2020 and considered to remain accurate.
- 2.27 The CSUCP (Policy CS10) sets out Newcastle’s housing requirement of 19,000 new homes across 5 phases of the plan period to 2030 (excluding student accommodation). It should be noted that demolitions have slowed significantly since 2014 to approximately 50 dwellings a year, with the reduced trend generally anticipated to continue until 2029/30.

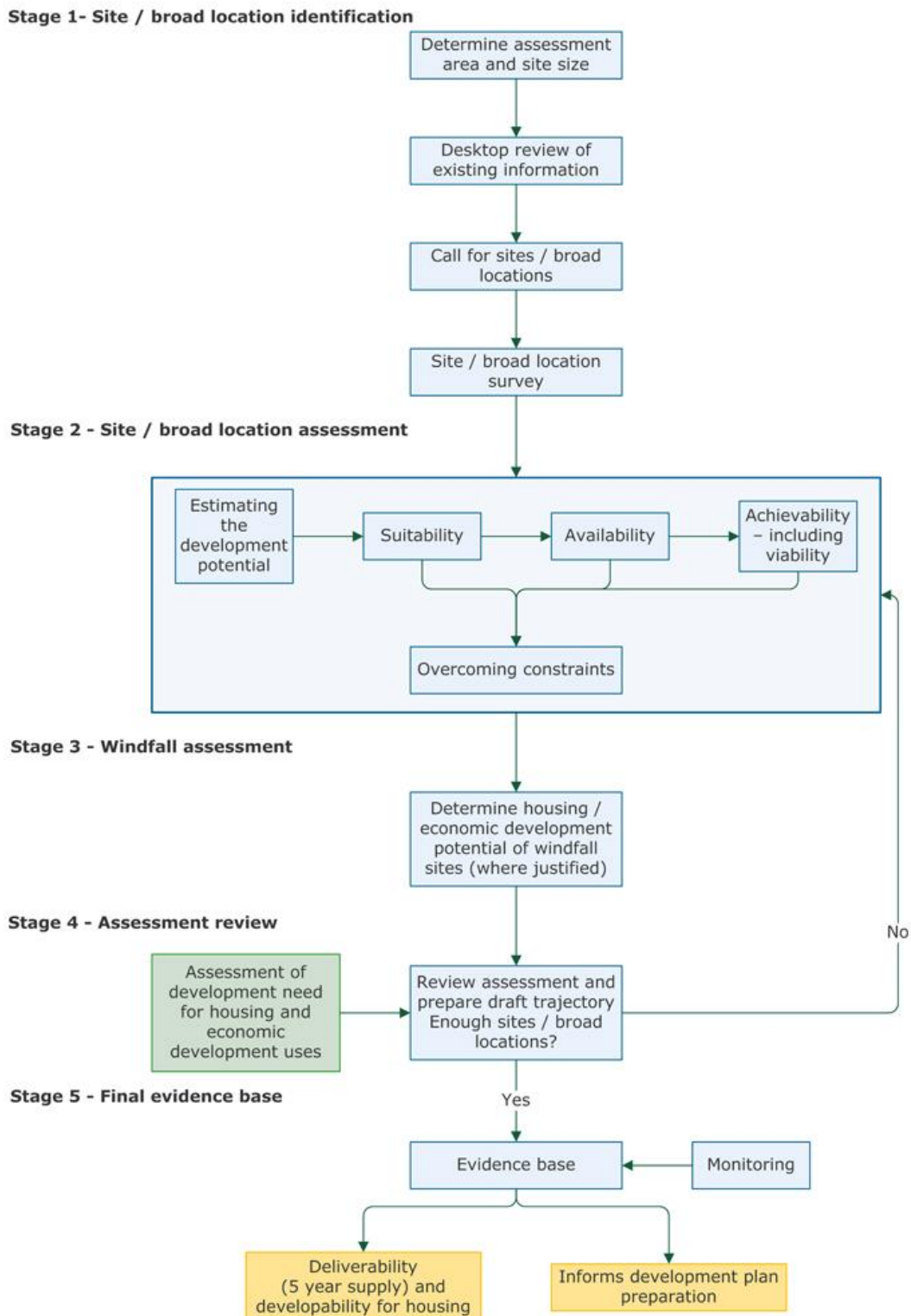
	<b>2010-15</b>	<b>2015-20</b>	<b>2020-25</b>	<b>2025-30</b>	<b>Total</b>
Gross Provision	2600	5100	5650	5650	19000
Forecast Lost	1200	300	250	250	2000
Net Provision	1400	4800	5400	5400	17000
Per Annum	520	1020	1130	1130	950

Figure 1 Newcastle Housing Requirement 2010-30

- 2.28 The latest (2021) median affordability ratio for Newcastle has decreased slightly and is now identified as 5.52, with a resulting adjustment factor of 1.095 for Newcastle. Applying the adjustment factor to the baseline growth results in a minimum local housing need figure of 1,052 dwellings per annum for Newcastle. Amendments to the planning practice guidance in December 2020 added a city and urban centres uplift to the methodology which results in 1,402 dwellings per annum (2021). The local housing need figure is greater than the annualised CSUCP housing requirement of 850 (net) dwellings per annum, and the annualised housing requirement for the remaining plan period of 1,080 p.a.(net) (2020-30).
- 2.30 Newcastle CSUCP identifies a need to maintain a minimum of 80 hectares of net developable employment land to meet the gross employment land requirement (including office floor space). A minimum of 410,600 square meters (gross internal area) of office space are required in Newcastle. This will ensure a range of sites flexible enough to accommodate changing economic circumstances and respond to market demands, whilst supporting emerging entrepreneurship within sustainable locations.

### 3 Methodology

3.1 The flow chart below, taken from the PPG, details the inputs and process which should be included to produce such a robust assessment. The council followed this flow chart and this section of the report sets out how each stage of the assessment will be achieved.



## Stage 1 - Site/Broad Location Identification

### Determine Assessment Area

- 3.2 The geographical area to be covered by the HELAA will be all the land within the council's administrative boundary. The area is subdivided into four areas; North, East, West and Outer West as illustrated in section 4. below (Figure 17).
- 3.3 The Guidance advocates a partnership approach, involving key partners from the outset. The Council recognises the importance of working in Partnership with other key stakeholders. The Council will seek to work with stakeholders, if there is interest to do so, and will consult with the following interests/groups:
- developers;
  - those with land interests;
  - land promoters;
  - local property agents;
  - local communities;
  - partner organisations;
  - Local Enterprise Partnerships;
  - businesses and business representative organisations;
  - parish and town councils;
  - neighbourhood planning groups.
- 3.4 The application of the HELAA methodology is supported by discussion within an internal panel, established to oversee the Stage 2 site assessment stage. This group comprises expertise in the delivery of housing and economic development.

### Site Size

- 3.5 The assessment has identified all sites and broad locations regardless of the amount of development needed to provide an audit of available land. The PPG states that a HELAA should consider all sites capable of delivering five or more dwellings for housing and 0.25ha or 500 square meters of floorspace and above for employment land with a variation in the City Centre to include smaller sites. Smaller sites may be considered where the LPA considers it appropriate, for example, where a site is below the size threshold but could still support 5+ dwellings.

### Desktop Review of Existing Information

- 3.6 The Stage 1 desktop review provides a baseline position and the starting point for sites to be considered as part of the HELAA. The PPG recommends that the desktop review should be proactive in identifying as wide a range as possible of sites for development.
- 3.7 The HELAA has considered all available types of sites and sources of data including:

Type of site	Data sources
<p><b>Allocated sites</b>            Since the publication of the SHLAA (2013)/ELR (2014) The CSUCP has been adopted. Allocated sites along with sites from the Development and Allocation Plan will be included in the HELAA and considered suitable</p>	<p>Local Development Documents</p>
<p><b>Planning Applications</b>            Planning Applications will be reviewed regularly, and information collated in the HELAA database. Where necessary the council will contact developers/landowners to ascertain delivery plans to ensure forecasting is accurate.</p>	<p>Planning applications records (Outline/full planning permissions)            Pending Applications            Expired Applications            Development starts and completions records            Pre-Application records</p>
<p><b>SHLAA/ELR sites</b>            Sites including the previous call out for sites will be reviewed to ensure the site assessment are up to date and accurate.</p>	<p>SHLAA 2017            ELR 2018            Call out for sites</p>
<p><b>Fairer Housing Unit Sites and Land in the local authority's ownership that may be surplus.</b>            Site identified by the FHU will be assessed by the HELAA process.</p>	<p>Local authority records            Commercial property databases</p>
<p><b>Brownfield and vacant/derelict land and buildings</b>            Brownfield land which is currently considered to be under utilised is a further source of potential development sites. Derelict and vacant sites will be identified through a site search process carried out by planning officers using a variety of methods including desktop survey, local knowledge and suggestions from residents through consultation exercises.</p>	<p>Local authority records            Local planning authority Empty Property Register            Brownfield Land Register</p>
<p><b>Housing and Economic Development sites under construction</b>            Sites where development has started, but is not completed.</p>	<p>Information of these sites will be sourced from the Councils monitoring reports.</p>
<p><b>Office to Residential, Retail to Residential and any other updates to permitted development rights</b></p>	<p>Local Development Orders</p>

Sites which fall within 'permitted development rights' that allow for change of use or conversion to residential use.	
<b>Internal site suggestions from Planning Officers, Housing Officer, Economic Officer and other Officers e.g. Housing Officers, Leisure Officers etc.</b> Sites/broad locations from general knowledge of Newcastle will be included if they have not already been identified through other sources of supply.	Technical Assessment Development Briefs
<b>Housing and economic development sites put forward during a "Call for Sites" consultation and throughout the Local Plan production.</b>	Any sites/broad locations submitted directly to the council for consideration through periods of consultation and/or submitted independently e.g. from landowners, agents, RSLs and developers etc. This may also include sites promoted by the LEP and other Duty to Cooperate organisations.

Figure 2 Data Sources

- 3.8 Rather than simply relying on the current information as being correct and up to date, the council seeks to confirm data accuracy with agents/landowners/ developers and other interested parties. Each year developers are asked to confirm sites are suitable, available and achievable and if the site is correctly identified as deliverable or developable.

### Call out for sites/Broad Locations Survey

- 3.9 The Council was part of a Government Pathfinder pilot to test a new digital platforms and open data associated with a call out for sites. It is anticipated that the next call out for sites will run in spring 2022. For this, the council is preparing a new digital and transparent tool for undertaking a call out for sites. However, this process will continue to seek sites for housing and economic development sites, and will involve the council notifying the following of the opportunity to submit sites:

- Landowners/developers/agents on the HELAA database;
- All contacts on the Local Plan database;
- Parish Councils;
- Neighbouring authorities;
- Statutory consultation bodies.

- 3.10 The HELAA site profiles are circulated at least annually to all corresponding consultees and comments invited on the draft assessment of sites- especially

seeking comments on whether sites were considered as deliverable or developable. All of the necessary supporting information is published on the Council website as part of the consultation process; this includes a range of maps to assist the consultation process, with sites identified by colour, relating to the result of the assessment, allowing stakeholders to easily appreciate the full range of sites that had been assessed. At this point some correspondents seek to add land to the HELAA land supply, and any sites submitted to the Council that cannot be added to the HELAA (subsequent to site assessment), are listed in Appendix 4 as ‘discounted’ sites (with reasons identified).

## Site Survey

- 3.11 All sites identified for inclusion in the HELAA were mapped and information about them was recorded in the sites database.
- 3.12 In accordance with PPG, the following information was recorded at the survey stage:
- site size, boundaries, and location;
  - current land use and character;
  - land uses and character of surrounding area;
  - physical constraints (eg access, contamination, steep slopes, flooding, natural features of significance, location of infrastructure/utilities);
  - potential environmental constraints;
  - where relevant, development progress (eg ground works completed, number of units started, number of units completed);
  - initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.
- 3.13 National guidance advises that particular types of land or areas may be excluded from the assessment as long as the reasons are justified.
- 3.14 The Council have excluded:
- Sites less than five dwellings or under 0.25ha (unless they are Urban Core office sites);
  - Not within or adjoin a settlement;
  - Ongoing employment sites that are not recommended by the ELR for release;
  - Sites in the Green Belt.
- 3.15 The Council consider that the following designations, known as Category 1 (Figure 4), will deem sites unsuitable for development.

<b>Category 1 designations</b>	
Special Area of Conservation	Flood Zone 3B
Green Belt	HSE Inner Zone
Site of Special Scientific Interest	Historic Parks and Gardens
National Nature Reserve	
Scheduled Ancient Monument	

Figure 3 Category 1 designations



- 3.16 Sites submitted in these areas were discounted but included in the HELAA for the purpose of completeness. Other policy designations from Newcastle's Local Plan and National guidance known as Category 2, such as open space, historical buildings may affect the scale and type of development. Category 2 designation sites were not automatically discounted by the HELAA but rather act as an indicator that the site may well have some constraints which would need to be addressed if the site is to be deemed suitable. Sites with open space protection that have been assessed to be suitable for development have been included in the land supply, those that are still to be assessed are discounted for now but will be re- appraised once site specific open space assessments have been completed. This reflects the Planning Practice Guidance that indicates the assessment should be as comprehensive as possible and not be narrowed in scope by existing policies designed to constrain development. It is for this process to "test again the appropriateness of other previously defined constraints, rather than simply to accept them."
- 3.17 Sites have been visited by Planning Officers in order to assess aspects that may not be immediately evident from the desktop survey. This included factors such as topography and other physical constraints. Sites with an extant planning permission and those under construction are considered to be suitable so site surveys were not undertaken for these sites as part of the HELAA process. However, development progress on sites will be monitored and site visits undertaken to the larger sites on an annual basis to verify progress.
- 3.18 **Registered Historic Battlefields** – the HELAA 2016 included Registered Historic Battlefields as a Category 1 designation. Following the Consultation on the HELAA which took place between 9 October 2017 and 20 November 2017, the Council reviewed the responses to the consultation and concluded that the designation should not automatically result in a site being discounted. The reasons for this decision are set out below.
- 3.19 Newburn Battlefield is the only Registered Historic Battlefield in Newcastle City Council's administrative area. It is one of only two Registered Historic Battlefields in the Country to include large areas of existing development within the designated area, the other is at Neville's Cross in County Durham.
- 3.20 The Council has reviewed guidance recommended in Historic England's comments on the HELAA consultation. We have also taken account of Historic England's report '*Strategic Research for the registered Battlefield at Newburn Ford and Boroughbridge*' and have sought advice and guidance on matters relating to Newburn Battlefield from the Tyne and Wear Archaeology Officers. Based on the review of comments, evidence and on the advice provided by the Council's Conservation Team we consider that the allocation of land for employment within the Newburn Battlefield area is still appropriate given its atypical character, and any impacts can be appropriately mitigated.
- 3.21 The Council has revised its HELAA methodology on the grounds that Newburn Riverside Registered Battlefield is an atypical example of a Registered Battlefield,

which includes significant areas of existing housing and industrial development. As such it should not fall into Category 1 because this would prevent development of sites which are otherwise available and suitable for development, and which do not negatively impact the historically or archaeologically significant parts of the Registered Historic Battlefield and pertain to development in existing industrial and residential areas.

## **Stage 2 – Site/Broad Location Assessment**

- 3.22 Once all the sites were collated as part of the site survey they were then assessed for their suitability, availability and achievability for future development. Sites were assessed against existing or emerging planning policy to enable the council to establish if a site is can be considered to be deliverable over the plan period.

### ***Estimating the Development Potential***

- 3.23 The PPG indicates an estimate of the development potential should be guided by existing or emerging plan policy. The guidance indicates that where the development plan policy does not provide a sufficient basis to make a judgment then relevant existing development schemes can be used as the basis for assessment. In some locations, where considered appropriate to do so, the density has been adjusted to reflect local characteristics.

### ***Density***

- 3.24 The NPPF does not identify an indicative minimum net density threshold. The PPG suggests that where considered appropriate to do so, density should reflect local characteristics. Where information was available from sources such as planning applications, pre-application discussions, development briefs, masterplans or allocations the known density information has been used.
- 3.25 The HELAA methodology includes a Housing Capacity Calculator (Figure 4). This assumes that the density of housing varies for a number of standard property sizes and types for example in suburban locations an average 4 bed house is 24 units per hectare compared to 250 units per hectare for studio flats in the Urban Core. The densities are considered to be realistic rather than aspirational and were tested in 2019 against recent past permitted scheme capacities to ensure the calculator remains robust. Of the 15 sites reviewed, the HELAA forecast housing capacities were recorded to be within 6% of the subsequent approved schemes. Thus the HELAA will continue to use the assumptions used in the below figure.

Suburban Sites	Studio	1 bed Apartment	2 Bed Apartment	3 Bed Apartment	2 Bed House	3 Bed House Medium	3 Bed House Large	4 Bed House	2 Bed Bungalow
Indicative unit floor area (net internal) (sq.m)	30	45	60	80	70	80	90	105	60
Site coverage (internal footprint/site area)	12.5%	15%	16%	16%	17.5%	16%	13.5%	12.5%	18%
No. of storeys	3	3	3	3	2	2	2	2	1
Total net internal floorspace/ha. (sq.m)	3750	4500	4800	4800	3500	3200	2700	2500	1800
Indicative density (dwellings/ha.)	125	100	80	60	50	40	30	24	30
Land take per unit (ha.)	0.008	0.010	0.013	0.017	0.020	0.025	0.033	0.042	0.033
City Centre Sites	Studio	1 bed Apartment	2 Bed Apartment	3 Bed Apartment	2 Bed House	3 Bed House Medium	3 Bed House Large	4 Bed House	2 Bed Bungalow
Indicative unit floor area (net internal) (sq.m)	30	45	60	80	70	80	90	105	60
Site coverage (internal footprint/site area)	15%	18%	19.2%	19.2%	24.5%	16%	15%	14%	24%
No. of storeys	5	5	5	5	2	3	3	3	1
Total net internal floorspace/ha. (sq.m)	7500	9000	9600	9600	4900	4800	4500	4200	2400
Indicative density (dwellings/ha.)	250	200	160	120	70	60	50	40	40
Land take per unit (ha.)	0.004	0.005	0.006	0.008	0.014	0.017	0.020	0.025	0.025

Figure 4 Housing Capacity Calculator

3.26 Plot densities vary considerably depending on the type of employment use being proposed. For example, the ELR assumes that a site of 1ha gross area would be capable of accommodating 4,000 sqm of out of centre office, industrial or warehousing / distribution floorspace (equivalent to 40%). Assessments of town centre office densities carried out by

Cushman and Wakefield on behalf of the Council identified densities of over 200% in the city centre. City Centre office capacity is based on the best available information about the proposed mix of uses, proportion of office floorspace, and where available, elements of masterplans. In the absence of more detailed information about specific sites, provided by developers, planning applications, or masterplans, the ELR assumes plot ratios of 150% for the City Centre, and 60% for out of town locations.

*Gross to net site area (developable area)*

- 3.27 The developable area is the likely proportion of the site which will be available for residential development, after taking into account provision of infrastructure, open space and other land uses designed to complement housing development. For larger sites a greater percentage of the total site area is deducted in order to give this developable area that can be used for housing. This takes into account other uses that are likely to be incorporated into larger housing schemes such as education provision or the need for critical infrastructure such as new roads.
- 3.28 The Tyne and Wear Strategic Housing Land Availability Assessment (SHLAA) Sub-Regional Addendum Concept Paper and Supplementary Guidance set out assumptions for estimating net developable area which are considered appropriate for the SHLAA (Figure 5). Newcastle City Council has adopted the higher net developable area to reflect the predominantly urbanised character of the area. The assumed developable percentages on sites yet to be approved or started were tested in 2019 with the preparation of urban design sketches, and with the assessment of site capacity yields. The proportions are considered to remain valid.

Gross site area (ha)	Percentage net
Less than 0.4 ha	100%
0.4 to 2 ha	90%
Over 2 ha	75%

*Figure 5 Gross to Net ratios*

- 3.29 The net developable area of employment sites is identified in a different way to that of housing. Take-up of employment land is typically recorded on a plot by plot basis, which equates to a net developable area. Availability should be measured on the same basis. Therefore for some sites, gross to net adjustments may be appropriate. We have considered each site and estimated the proportion of land which is likely to be lost to servicing and landscaping, having regard to typical gross:net ratios achieved on industrial estates and business parks elsewhere in the region. Gross to net ratios can vary from 100% where a site is in single occupation and has few or no constraints, to below 60% for a business park on a sloping site with large areas set aside for landscaping and sloping banks between development plots.

*Capacity (Yield)*

- 3.30 Where there is 'known' information of a site capacity from approved planning applications, masterplans, the call out for sites process or developer discussion with the council this was taken into account. Where no such information was provided site capacity was based on informed estimates, which may be subject to change as a detailed scheme is submitted to the Council. When using the HELAA assumptions, the capacity is calculated from the 'developable area' multiplied by an appropriate

housing/economic density. The density is derived by assuming the same residential mix and scale of development in the surrounding land to the sites, unless there are other site specific factors that ought to be taken into account.

## Suitability

- 3.31 Assessing the suitability of sites or broad locations for development was guided by:
- the Newcastle Development Plan and supporting adopted guidance, emerging plan policy and national policy;
  - market and industry requirements in the housing market or functional economic market area.
- 3.32 Sites were initially assessed against the Development Plan (CSUCP and DAP), taking account of how up to date the plan policies are and considering the appropriateness of identified constraints on sites/broad location and whether such constraints may be overcome. The assessment of sites was a dynamic process and as the Local Plan progresses there will be a need to update the suitability of sites in light of any emerging policy changes.
- 3.33 Sites allocated in the local plan or with planning permission were generally considered suitable for development although there may be instances where it is necessary to assess whether circumstances have changed which would alter their suitability. This has included a re-appraisal of the suitability of previously allocated land and the potential to designate allocated land for different uses.
- 3.34 The following factors were considered to assess a site's suitability for development now or in the future:
- physical limitations or problems such as access, infrastructure, ground conditions, flood risk,
  - planning policy restrictions,
  - hazardous risks, pollution or contamination;
  - potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
  - appropriateness and likely market attractiveness for the type of development proposed;
  - contribution to regeneration priority areas.
- 3.35 In addition to the above considerations, information gathered at the Stage 1 of the HELAA methodology also informed the suitability assessment.
- 3.36 Sites designated as Category 2 (Figure 6) will be assessed for their suitability. Although category 2 sites are not considered to be unsuitable the designations may affect the nature or extent of development of a site.

Archaeological Site	HSE Middle and Outer Zones
Area of Outstanding Natural Beauty	Flood Risk Zones 2 and 3a
Conservation Area	Local Nature Reserve

Designated Open Space and allotments	Minerals Safeguard Area
Grade I Listed Building	Non-designated Open Space
Grade II* Listed Building	Part of Strategic Green Infrastructure network including Area of Opportunity
Grade II Listed Building	Protected Species or Habitat
Sites of nature conservation importance (SNCI)/local wildlife site	World Heritage Site
Newburn Battlefield Registered Historic Battlefield	

Figure 6 Category 2 Designations

3.37 The following matters were considered and noted at the desktop assessment stage, some of them precluded development depending on the extent to which the utility covers a site and its potential impact:

- High pressure gas pipelines;
- Oil pipelines, national grid transmission lines;
- Immovable communication links, such as high speed fibre optic cables utilised by businesses in the area;
- Major hazard site.

3.38 Sites for new economic development were normally considered suitable where there is good access to strategic transport infrastructure, services and facilities or where the site adjoins part of an existing employment site. The following criteria were also considered specifically in relation to the suitability for economic development:

- Whether the site has /can gain good access to the strategic transport network. The time needed to access the strategic network has been considered, taking into account distance but also known congestion levels;
- Whether the site adjoins /could adjoin part of an existing employment site. If an adjoining site is well utilised then it is likely to be a commercially attractive location;
- Whether the site has access/is capable of providing access to non-employment uses for employees to utilise such as food and leisure facilities;
- The site's proximity to residential areas and other adjoining uses to ensure economic development wouldn't result in an adverse impact on local amenity;
- Whether the site is constrained by gradient. Sites of significant gradient are less suitable for some economic development, than housing uses, such as B8 (warehousing).

### Availability

3.39 A site was considered available for development, when, on the best information available (confirmed by the call out for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell. Although generally

speaking the existence of a planning permission suggests a site is available, there may be instances where it does not.

3.40 Where potential problems are identified, then an assessment has been made as to how and when such issues can realistically be overcome. Consideration was also given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.

3.41 In order to ensure a transparent and reasonable process, all sites were treated equally regardless of whether they are in public or private ownership. Sites lacking in precise information on ownership were assessed as 'not currently available'.

#### Achievability - Including Viability

3.42 In accordance with the PPG a site was considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.

3.43 Achievability is affected by:

- market factors – such as adjacent uses, economic viability of existing, proposed and alternative uses in terms of land values, attractiveness of the locality, level of potential market demand and projected rate of sales (particularly important for larger sites);
- cost factors – including site preparation costs relating to any physical constraints, any exceptional works necessary, relevant planning standards or obligations, prospect of funding or investment to address identified constraints or assist development; and
- delivery factors – including the developer's own phasing, the realistic build-out rates on larger sites (including likely earliest and latest start and completion dates), whether there is a single developer or several developers offering different housing products, and the size and capacity of the developer. In addition, where there is public ownership, there is potential for greater control of delivery mechanisms.

3.44 The Council has a track record of facilitating delivery of homes in the lower value areas where viability is more constrained through making the most use of local authority owned land to stimulate development. Figure 7 below indicates the higher level of public ownership of sites in the Low, Low Mid viability areas compared to lower public ownership in the higher viability areas and non-urban sites.

Residential Value Profile Area	Total Capacity	Of which Public or Third Sector	% of Total Capacity
City Centre	5113	1013	20%
High	504	110	22%
High Mid (Urban)	559	163	29%
High Mid (Non-Urban)	7818	0	0%
Mid (Urban)	1615	310	19%
Mid (Non-Urban)	1937	418	22%
Low Mid	2720	2306	85%
Low	1217	1001	82%
<b>Total</b>	<b>21483</b>	<b>5321</b>	<b>25%</b>

Figure 7: Residential Sites in Public Land Ownership (2018)

- 3.45 The viability of each site was tested by the Newcastle Viability Model – an in house strategic viability tool developed for the CSUCP that utilises compatible development assumptions incorporating assumed developer contributions and Community Infrastructure Levy (CIL). This approach was considered to be appropriate to use for this assessment and consistent with the requirements of the PPG.
- 3.46 Derived from the Council’s Viability and Deliverability Report (2018), the viability testing of sites in the HELAA also includes an analysis of notional site viability within identified development typologies. This enables a broad estimate of whether a site is likely to be viable or not. In addition, site specific testing based on a forecast residential mix is undertaken. The build costs and sales values have been updated to align with the Viability and Deliverability report, with the assumed residential market values and rental values used for housing and employment set out in Figure 9 & 10 below.

		High Zone 1	High-Mid Zone 2	Mid Zone 3	Low-Mid Zone 4	Low Zone 5
<b>AVERAGE RATE £/m2</b>	NDSS	3,050	2,550	2,150	1,875	1,700
	Size	<b>Sales Values (£/unit)</b>				
<b>1 bed flat</b>	45	137,250	114,750	96,750	84,375	76,500
<b>2 bed flat</b>	66	201,300	168,300	141,900	123,750	112,200
<b>3 bed flat</b>	85	259,250	216,750	182,750	159,375	144,500
<b>2 bed house</b>	75	228,750	191,250	161,250	140,625	127,500
<b>3 bed house</b>	96	292,800	244,800	206,400	180,000	163,200
<b>4 bed house</b>	114	347,700	290,700	245,100	213,750	193,800

Figure 9 Estimated sales values for notional property types by value band (2018)



Scheme Type	Rental Value£/m2 and Yield%			
	Low	Med	High	Newcastle Central Area
Offices	86	108	161	226
Yield	8.5%	8.5%	7.5%	7%
B2 Industrial, B8 Warehousing	40	55	70	
Yield	10%	8.0%	7.5%	

Figure 10 Estimated Commercial Rental and Capital Values for notional property types by value band (2018)

- 3.47 Where constraints have been identified, the assessment considered what action would be needed to remove them (along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered).
- 3.48 Once the suitability, availability and achievability of sites had been assessed, and any constraints identified, the likely timescale and rate of development for each site was then assessed. This will be continuously updated throughout the Local Plan process, with advice being sought from developers on likely timetables, progress made, and any further constraints which may arise.

#### *Deliverable and Developable Sites*

- 3.49 The NPPF requires that sites are considered to be deliverable, developable or not currently developable for housing development. The NPPF defines deliverable and developable as:
- Deliverable – To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years; and
  - Developable – a site should be in a suitable location for housing development, and there should be a reasonable prospect that housing could be developed within 6-10 years or 11-15 years.
- 3.50 In order to demonstrate 5 years' worth of deliverable housing sites, the PPG advises robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:
- have outline planning permission for major development;
  - are allocated in a development plan;
  - have a grant of permission in principle; or

- are identified on a brownfield register.

Such evidence, to demonstrate deliverability, may include:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;
- firm progress with site assessment work; or
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects. Paragraph: 007 Reference ID: 68-007-20190722

3.51 If sites were neither deliverable nor developable they will be classified as currently not deliverable.

#### *Sites with Planning Permission*

3.52 The NPPF indicates that sites with planning permission could be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years.

3.53 For HELAA housing sites with planning consent (those of 5 units or more), the council will consult directly with land owners and developers, in order to obtain up to date delivery information about a site. Unless the council has good reason not to do so, delivery forecast information received will be accepted. When no information is received, delivery information from previous years will be used to inform a delivery forecast. If no recent delivery information has been obtained, delivery assumptions will be applied. The same principles were applied to employment sites.

#### *Sites without Planning Permission*

3.54 PPG indicates that planning permission is not a prerequisite for a site to be considered deliverable within five years. However, the council will make a general assumption that sites without planning consent sites will not deliver within five years unless there is evidence to suggest otherwise. Sites without planning consent may start to deliver within five years such as allocated sites in the CSUCP or sites which an application is pending or housing schemes which the council is proposing to deliver through its Fairer Housing Delivery Programme. These sites will considered part of the five year housing land supply where they are considered to meet the deliverability definition in NPPF.

3.55 Otherwise, sites will be assumed to start to deliver within 6-10 years or later. Where significant constraints are identified, or sites appear to represent a later phase of an adjacent development, they will be assumed to start to deliver within 11-15 years.

3.56 The following table (Figure 11) was prepared for the SHLAA 2013. It provides a broad indication of likely maximum average build rates in the Newcastle housing market area. This will be used to inform the deliverability of housing sites. Figure 12 indicates the assumptions used for commercial schemes and deliverability.

#### *Residential Delivery Assumptions*

Site Size	No of Outlets	No. of Developers	Sales per developer per month	Average build rate per annum
<100	1	1	2.9	35
100-500	1	1	4.2	50
500+	1	1	4.6	55
	1	2	3.1	75
1000+	1	3	2.5	90
	1	4	2.1	100
	2	1	4.2	100
	2	2	2.9	140
	2	3	2.3	165
	2	4	1.9	185
2500+	3	1	3.9	140
	3	2	2.8	200
	3	3	2.3	250
	3	4	1.8	275

Figure 11 Residential Delivery Assumptions

<b>Build period (months) – non-residential</b>	
Offices – Centre	14
Offices – Out of Town	14
B2 Industrial	6

Figure 12 Commercial Delivery Assumptions

#### *Testing Validity of Delivery Assumptions*

3.57 In 2019 in order to validate the assumed delivery assumptions above (Figure 11), the Council undertook a review of sites with housing completions since 2014/15. The actual average build rate in the city is very similar to the assumptions for sites with a capacity of under 100 dwellings, 100 to 500 and 500 units or more ( See Figure 13 below). An average lead in of 2 years from approval of planning permission to a start on site is assumed in the HELAA trajectory and the lapse rate was tested for the previous (2016/17- 2018/19) and only 4.7% of dwellings permitted had lapsed planning permissions ( excluding those dwellings with subsequent approvals) . The delivery rates used in the trajectory also take into account other evidence such as past delivery rates, discharge of conditions and additional information regarding planned and committed infrastructure.

## Build out rates

Delivery Assumptions		Past Completions- Average per annum					
Site size	Assumed Average Build Rate	2014/15	2015/16	2016/17	2017/18	2018/19	Average
<100 dwellings	35	26	30	33	29	30	30
100-500	50	59	95	70	55	50	66
Newcastle Great Park (2,000 units+)	90-275	223	263	212	167	257	224

## Lapse Rate

Year	2013/14	2014/15	2015/16	Average
Planning Permissions Granted (dwellings)	1029	667	1630	1109
Year	2016/17	2017/18	2018/19	Average
Started on site (dwellings)	923	546	1155	875
Subsequent Planning Approval/ Renewal (dwellings)	989	610	1566	1055
Lapsed Permissions (dwellings)	34	48	58	47
Lapsed Permissions Rate (%)	3.3	7.2	3.6	4.7

Figure 13 Review of Delivery Assumptions (Use Class C3)

### Stage 3 - Windfall Sites

- 3.58 Paragraph 70 of the NPPF states that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the historic windfall delivery rates and expected future trends, and should not include residential gardens.
- 3.59 This is certainly the case in respect of small housing sites and the HELAA incorporates a small site windfall allowance based upon a conservative assumption that unidentified developments of fewer than 5 homes will continue to yield at least 50 completions per annum.
- 3.60 Windfall assessments will be made and published annually through the council's Authority Monitoring Report (AMR). This will include an assessment of historic windfall delivery rates as well as the expected future trend for windfall delivery. No windfall allowance is made for employment sites.

### Stage 4 - Assessment Review

#### Review Assessment and prepare trajectory

- 3.61 Following the assessment of all sites, the development potential of all sites was collected to produce trajectories for sites. This sets out how much housing and

employment land can be provided, and at what point in the future. An overall risk assessment will be made as to whether sites will come forward as anticipated.

- 3.62 If insufficient sites were identified against objectively assessed need, then the council would have revisited assumptions. Following the review if there were still insufficient sites, then it would have been necessary to investigate how this shortfall would be planned for. If there is evidence that the needs cannot be met locally, it would have been necessary to consider how needs might be met in adjoining areas in accordance with the Duty to Cooperate.

#### Identify specific developable sites or broad locations for housing growth for year 11-15

- 3.63 The Planning Practice Guidance allows for the investigation of potential broad locations where identifiable sites will not provide sufficient land for housing land to meet the land supply requirement for 15 years (or more). Identification of broad locations for housing and other strategic development is supported by the National Planning Policy Framework (paragraph 67).
- 3.64 The NPPF and PPG do not require that Local Planning Authorities identify developable sites or broad locations for employment growth for over an 11-15 year period in the same way as they do for housing. However as the Council has assessed its housing and employment land supply as part of the same HELAA exercise, we have also attempted to identify an indicative trajectory of employment sites which includes expected phasing of development over the next 15 years.

### Stage 5 - Final Evidence Base

#### Data Outputs

- 3.65 Following developer consultation, the council publishes this report, a Housing and Mixed Use Site Schedule and an Employment Land and Mixed Use Schedule which includes:
- A list and map of all sites;
  - An assessment of each site, covering its suitability for development, availability and achievability. The achievability of each site includes an assessment of the site's viability. This assessment determines whether a site is realistically expected to be developed and the timeframe for any such development, or reasons why a site has been discounted for future development;
  - The potential type and quantity of development which could be delivered on each site or broad location. This will include an estimate of build out rates for housing as well as any barriers to delivery which may be needed to be overcome;
  - An indicative trajectory of the estimated delivery of the potential development.

#### Monitoring

- 3.66 Once site assessments have been collated into a schedule this will be used to continuously monitor sites. The council will on an annual basis publish the Five Year

Land Supply, the Housing Trajectory, student housing data, the Housing and Employment Site Schedules in conjunction with the Authority Monitoring Report.

### Five Year Land Supply

- 3.67 NPPF requires local planning authorities to identify and maintain a rolling five-year supply of deliverable housing land. The assessment of this supply is a material consideration in the determination of residential planning applications and helps to ensure that the objectively assessed housing needs of the local area are met over the life of the plan period.

## 4 Assessment Findings

- 4.1 This section of the report presents the overall findings from the HELAA 2021, including the identification of the City's 'deliverable' and 'developable housing and employment land supply.

### Employment Supply

- 4.2 The HELAA provides an accurate estimate of current available employment land within the City. It will be essential that all employment land is deliverable to meet employment land requirements as set out in the CSUCP.
- 4.2.1 The HELAA has been undertaken in conjunction with demand work to ensure that the City has a realistic view of future demand as well as a qualitative assessment of current supply to ensure that a sufficient pipeline of supply is planned for which meets likely future needs.
- 4.2.2 Detailed analysis of past take-up has been used to inform the appropriate level of allocations for offices and industrial or warehousing. Detailed site assessments have then been used to identify those sites to be retained for employment use; those to be de-allocated; and those that should be considered as new allocations.

### Deliverable and Developable Key Findings

- 4.2.3 The HELAA 2021 identified 35 sites to comprise Newcastle's employment land portfolio. 17 sites with significant potential for office development (including as part of mixed use schemes) were identified as part of the portfolio. This portfolio of sites totals 114.06 ha gross of employment land. 12 sites for general employment were identified for allocation in the DAP, with a further site, Newcastle CVA being allocated under its own policy. The remaining sites in the portfolio are allocated in the CSUCP.
- 4.2.4 The figure below shows the allocation status of Newcastle's employment land portfolio. In addition to the potential employment land set out above, which is available for allocation within the DAP, additional employment land is allocated through the CSUCP, focused in the Urban Core, and in the two Key Employment Areas of Newcastle International Airport, and Walker Riverside.

#### 4.2.5

	Hectares
Employment Land Requirement	80.0
CSUCP Allocations	65.1
<b>Residual plan requirement</b>	<b>14.9</b>
<b>DAP</b>	
DAP New Employment Sites DM1	24.2
Buffer %	<b>162.6</b>
<b>Total available employment land</b>	<b>89.3</b>
Take up (2010- 21)	30.51
<b>Residual Requirement</b>	<b>49.5</b>

Figure 14 Supply of employment land

Location	Total land allocations (ha) net	Net residual land after completions	Total Short-term (ha) net	Total Medium-term (ha) net	Total Long-term (ha) net
East	<b>17.87</b>	16.18	12.05	3.19	0.96
North	<b>0</b>	0	0	0	0
Outer West	<b>53.37</b>	53.25	10.2	23.1	20
West	<b>18.20</b>	17.3	3.07	12.18	2.05
Total	<b>89.30</b>	83.93	25.32	38.47	23.01

Figure 15: HELAA Sites against rolling 5 year flexibility margin

4.13 The trajectory set out in figure 15 in addition to identifying a total capacity of employment land in Newcastle, provides an indication of the rate of delivery of employment land in the City over a fifteen year time period. Sites that are anticipated to come forward in the first five years of the trajectory are considered to be deliverable. While the above trajectories give a good indication of the amount of employment land that is likely to come forward over the plan period, the delivery of development in the case of employment sites notwithstanding those sites with planning permission or where development is underway can be challenging to predict with complete certainty. Prevailing market conditions are likely to have a significant impact on factors such as the availability of finance, and developer confidence as well as demand for certain types of premises is difficult to predict over the long and medium term. Therefore the estimated timescales above provide an indication of the phasing of delivery. It should also be borne in mind that the Core Strategy requirement of 80ha net of employment land is a minimum figure and

should conditions merit it, further employment development could conceivably come forward within the plan period.

## Housing Supply

- 4.14 The HELAA database contains around 190 individual sites for future housing, with each assessment following the methodology as set out in Chapters 3. This analysis is supporting evidence for the delivery of the Joint Core Strategy and Urban Core Plan and the Development and Allocations Plan with regard to both the potential capacity for new housing in Newcastle and also for providing the key evidence for the site selection process. This evidence will ensure that the most sustainable and appropriate sites are selected for allocation.

### Deliverable and Developable sites Key Findings

- 4.12 The NPPF defines a deliverable site as one which is “available now, offers a suitable location for development now”, is achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans. For a site to be considered developable it “should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged”.
- 4.13 In total a capacity for 18,800 potential homes, on specific deliverable and developable sites, have been identified through the HELAA including assumed homes released as a consequence of planned student accommodation (following PPG methodology). Potential homes forecast for delivery beyond the plan period (after 2030) have also been included in this data.

	Deliverable	Developable	Total
<b>HELAA Housing Capacity</b>	6,852	11,165	18,017
<b>Student Accommodation – assumed units (based on PPG methodology)</b>	477	318	795
<b>Total</b>	<b>7,329</b>	<b>11,483</b>	<b>18,812</b>

Figure 16 Housing Supply



## Sub Areas

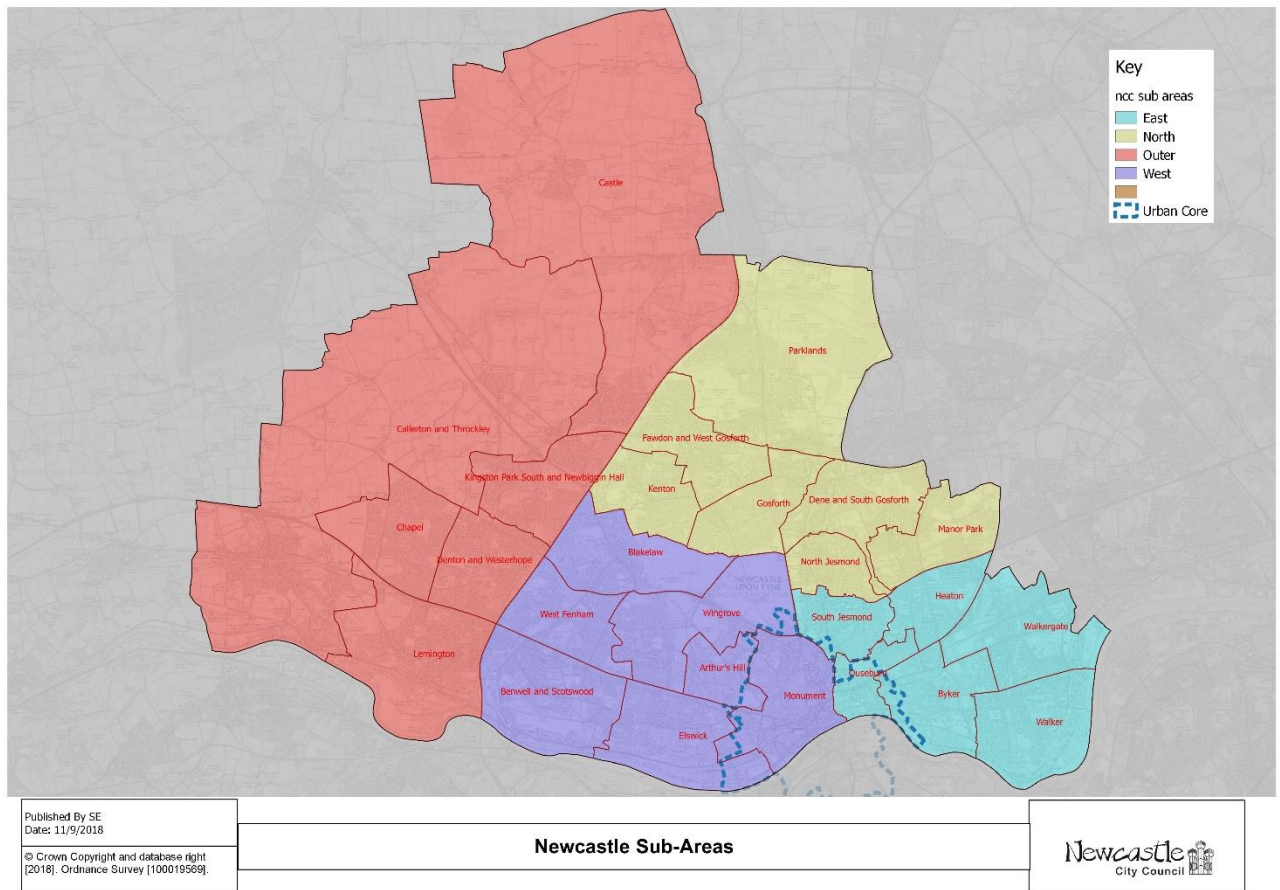


Figure 17 Geographic Sub Areas

- 4.14 Analysis has been carried out on the identified supply on the basis of ‘sub-areas’; this helps to determine the likely locations of new delivery over the plan period. Figure 17 above shows the boundaries of the sub-areas used in the HELAA analysis and Figure 18 indicates the housing supply totals by sub area.

Sub Area	1-5 years	6-10 years	10-15 years	Sub Area Total
East	452	1,580	241	2,273
North	103	657	116	876
West	2,944	2,231	849	6,024
Outer west	3,353	2,949	2,542	8,844
<b>Total</b>	<b>6,852</b>	<b>7,417</b>	<b>3,748</b>	<b>18,017</b>

Figure 18 Sub Areas: Housing Supply

- 4.15 In reaching these conclusions, the Council has considered information provided by stakeholders, the delivery record of the developers or landowners putting forward

sites, planning permissions and planning histories of sites, including the presence of previously unimplemented permissions.

### Brownfield and Green Field Development

- 4.16 Prioritising building on brownfield sites is a key objective of the planning system and, as a result, the amount of development on brownfield sites is an important indicator which is monitored as part of the work to assess housing land supply. The Council published its first Brownfield Land Register in December 2017 and will publish an annual update to the Brownfield Register normally by the end of December of each year. This is also available to view on the Council's website.

### Site not considered part of the Housing Land Supply

#### Completed Development

- 4.17 Housing completions monitoring is now an integral part of the HELAA process and the findings from the latest round of completions monitoring is presented later in this report (Five Year Land Supply). Sites that are 'complete' i.e. have no remaining capacity, have been removed from the HELAA and therefore did not require a detailed assessment. These sites will be excluded from future reviews archived as completed developments.

#### Discounted Sites

- 4.18 At Appendix 4 of the HELAA is the schedule of discounted sites. The area maps show the location of these sites. The reasons for discounting are set out and could include the following reasons:
- Unsuitable due to other Local Plan policy or allocations;
  - Insufficient evidence to justify loss of or impact upon open space;
  - Insufficient evidence to justify loss of economic development land use;
  - Not expected to be achievable or to be available in the plan period.
  - Site is protected within the Green Belt and there are no demonstrable exceptional circumstances to release the land

#### Student Housing

- 4.20 The Newcastle and Gateshead SHMA (August 2017) reviewed the need to plan for housing needs, student accommodation and the impact of student growth on the wider housing market. Newcastle has experienced a protracted period of growth of purpose built student accommodation in the urban core following a period of expansion from 2010 at Newcastle and Northumbria Universities as well as Newcastle College that are all based in the city. Monitoring data and trends of student accommodation is included in the Authority Monitoring Report. There are a few consented schemes that we anticipate will be delivered in the next few years and these are set out in Appendix 3 to this report.

## 5 Year housing land supply and housing trajectory

- 5.1 This section of the report sets out how the Council has met its requirements and can demonstrated a five year supply of land for housing. The report takes into account the NPPF requirement for an additional 5% allowance on the five year land supply to create competition and choice in land supply.
- 5.2 The National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG) seek to underpin the Government’s step change in housing delivery through a more responsive approach to land supply at the local level. As a Local Planning Authority, Newcastle City Council are required to identify and maintain a rolling five year supply of deliverable housing land, to ensure the continued supply of homes in the area.
- 5.3 The NPPF states at paragraph 73 that local planning authorities should: *“identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:*
- a) *5% to ensure choice and competition in the market for land; or*
  - b) *10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan<sup>38</sup>, to account for any fluctuations in the market during that year; or*
  - c) *20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.”*

As the housing delivery test has been met over the past three years (including student and communal bedspaces), a 5% buffer has been applied.

Year	Housing Delivery Test Result
2018	244%
2019	245%
2020	203%
2021	180%

Figure 19 Newcastle upon Tyne: Housing Delivery Test (2018- 2021)

- 5.4 In terms of the ‘type’ of sites which can be included in the five year housing supply: NPPG offers the following advice:

*“In order to demonstrate 5 years’ worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions. [Annex 2 of the National Planning Policy Framework](#) defines a deliverable site. As well as sites which are considered to be deliverable in principle,*

*this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:*

- *have outline planning permission for major development;*
- *are allocated in a development plan;*
- *have a grant of permission in principle; or*
- *are identified on a brownfield register.*

*Such evidence, to demonstrate deliverability, may include:*

- *current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
- *firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;*
- *firm progress with site assessment work; or*
- *clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.*

*Plan-makers can use the [Housing and Economic Land Availability Assessment](#) in demonstrating the deliverability of sites.”*

Paragraph: 007 Reference ID: 68-007-20190722

- 5.5 This section of the report which covers the five year supply period from 1 April 2021 to 31 March 2026 Known site details have been updated, however, housing monitoring has been updated to the end of the financial year 2020-21.

### Calculating Newcastle’s Five Year Land Supply

- 5.6 This section of the report sets out Newcastle’s methodology for calculating its five year deliverable supply. Calculating a five year land supply includes four stages;
1. Identifying the five year period;
  2. Identifying the housing requirement for the five year period; and
  3. Identifying and assessing sites that have the potential to deliver housing in the five year period to determine the supply;
  4. Calculating the Five year land supply by comparing the supply against the requirement.

### Stage 1: Five Year Period

- 5.7 The first stage in calculating the five year land supply is to establish what period the five years will cover and to identify the start date 1st April 2021.

### Stage 2: Identifying the level of housing requirement for the five year period

- 5.8 The future housing requirement for Newcastle is set out in the Core Strategy and Urban Core Plan which was adopted in March 2015. Policy CS10 requires provision for 19,000 (gross), 17,000 (net) new dwellings between 2010 and 2030. As shown in Figure 19 below, the housing requirement in policy CS10 is phased to reflect the release of land to meet the housing needs.

	2010-15	2015-20	2020-2025	2025-30
<b>CSUCP Target (net)</b>	1400	4800	5400	5400
<b>Target (gross)</b>	2600	5100	5650	5650
<b>Per Annum (net)</b>	280	960	1080	1080

Figure 20 CSUCP Policy CS10 Housing Requirements

- 5.9 Based on the Core Strategy targets, the housing requirement for 2021/22-2025/26 is 5,400 dwellings. Figure 21 below illustrates the calculations.

2021/22	2022/23	2023/24	2024/25	2025/26
CSUCP annual Requirement	CSUCP annual Requirement	CSUCP annual Requirement	CSUCP annual Requirement	CSUCP annual Requirement
1080	1080	1080	1080	1080
Total 5,400				

Figure 21 Annual Requirement

- 5.10 Between 2010/11 and 2020/21 10,300 dwellings (net) have been completed (Figure 22).

	CSUCP Housing Requirement				Completions				Balance
	CSUCP Target (gross)	CSUCP Target (net)	Cumulative CSUCP Target (gross)	Cumulative CSUCP Target (net)	Dwelling Complete (gross)	Dwelling Complete (net)	Cumulative since (gross) 2010	Cumulative since (net) 2010	
<b>2010/11</b>	520	280	520	280	496	140	496	140	-140
<b>2011/12</b>	520	280	1040	560	456	293	952	433	-127

<b>2012/13</b>	520	280	1560	840	462	-103	1414	330	-510
<b>2013/14</b>	520	280	2080	1120	585	506	1999	836	-284
<b>2014/15</b>	520	280	2600	1400	806	743	2805	1579	183
<b>2015/16</b>	1020	960	3620	2360	927	762	3732	2341	-19
<b>2016/17</b>	1020	960	4640	3320	1078	1005	4810	3346	26
<b>2017/18</b>	1020	960	5560	4280	1102	951	5912	4297	17
<b>2018/19</b>	1020	960	6680	5240	2690	2,606	8,602	6,903	1,663
<b>2019/20</b>	1020	960	7,700	6200	1,884	1,843	10,486	8,746	2,546
<b>2020/21</b>	1,130	1,080	8,755	7,280	1,659	1,626	12,145	10,372	3,092

2072 *Figure 22 Delivery against housing requirement 2010-2020*

- 5.11 Once the five year requirement has been calculated the NPPF (paragraph 73) requires local authorities to identify a 5% buffer to ensure choice and competition in the market but suggests this should be increased to 20% where there has been a record of persistent under delivery of housing. Where there has been a record of persistent under delivery of housing, the NPPF also requires local planning authorities to increase the buffer to 20% (moved forward from later in the plan period).
- 5.12 At the time of the adoption of the Core Strategy and Urban Core Plan it was recognised that Newcastle has a record of persistent under delivery, and indeed Figure 21 above indicates the deficit of housing supply against the CSUCP target up to 2013/14 and again in 2015/16, whereas, you will note that there is currently additional cumulative delivery (in excess of 3,000 units) above the plan target by 2020-21. NPPF (February 2019) stipulates where housing delivery falls below 85% of the housing requirement over the previous 3 years (as measured by the Government's Housing Delivery Test) a 20% buffer should be applied. Figure 19 above it is noted that Newcastle has recorded 180% delivery against the target within the housing delivery test result (2021). Thus, the standard 5% buffer has been applied. Figure 23 below indicates the calculated five year housing land supply requirement applying a 5% buffer.
- 5.13 Figure 23 below considers the five year land supply requirement. Figure 23A indicates a reduced requirement when discounting cumulative additional delivery over the plan target. The relative merits of this approach has been the subject of planning appeals and was recently considered at High Court in a case brought by Tewkesbury Borough Council (2021). Mr Justice Dove ruled in the High Court that it was a matter of planning judgment whether local authorities could use such an oversupply in previous years, and stated, " conclusions on housing land supply are in

my view an expression of the application of planning judgment to the particular circumstances of the claimant's five year housing land supply calculation". In Newcastle a programme of market interventions has helped to accelerate delivery of sites that would otherwise have expected to be delivered over a longer period of time in the housing trajectory. However, Figure 23 B also sets out the requirement without the discounted requirement for ease of comparison.

<b>Net housing Requirement 2010/11-2020/21</b>	<b>7,280</b>
<b>Total net completions</b>	10,372
<b>Under supply or over provision</b>	3,092
<b>Net housing requirement 2021/22-2025/26</b>	5,400
<b>Net housing requirement adjusted to undersupply/ over provision required</b>	2,308
<b>5% Buffer</b>	2,423

Figure 23A Five Year Land Supply Requirement :with adjustments for cumulative additional delivery over the plan target

<b>Net housing Requirement 2010/11-2020/21</b>	<b>7,280</b>
<b>Total net completions</b>	10,372
<b>Under supply provision</b>	0
<b>Net housing requirement 2021/22-2025/26</b>	5,400
<b>Net housing requirement adjusted to undersupply</b>	5,400
<b>5% Buffer</b>	5,670

Figure 23B Five Year Land Supply Requirement :without adjustments for cumulative additional delivery over the plan target

### Stage 3: Identifying and assessing sites that have the potential to deliver housing in the five year period.

- 5.14 To calculate the housing land supply, the Council has to identify what land is available and likely to be deliverable during the five year period. Sites are assessed within the five-year assessment against the three criteria of availability, suitability and achievability. Viability is a key consideration in the determination of site achievability.
- 5.15 Identifying sites that have the potential to deliver housing in the five-year period has been reviewed to comply with the revised definition in NPPF (February 2019). There are 2 general categories:

**Site with Planning Permission** - The NPPF indicates that sites with planning permission should be considered deliverable until permission expires, unless there is

clear evidence that schemes will not be implemented within 5 years (this is dependent on the type of permission and the size of site).

**Sites without Planning Permission-** NPPF indicates that planning permission is not a prerequisite for a site to be considered deliverable within five years. The Council will make an assumption that sites without detailed planning consent will not deliver within five years unless there is evidence to suggest to the contrary. NPPF indicates sites which are: allocated in a local plan, the subject of an outline planning permission/ permission in principle or on the brownfield land register are categories that may be considered to start to deliver within five years. In Newcastle we have considered the inclusion of sites that are:

- Allocated sites in Core Strategy and Urban Core Plan or the Development and Allocations Plan that have relevant planning applications pending (including applications for which there is a resolution to approve subject to a section 106 agreement)
- Housing schemes for which there is a public intervention and/ or additional funding to facilitate delivery. This may include Homes England intervention or schemes facilitated by the Council's Fairer Housing Unit with council commitment to delivery (including applications for which there is a resolution to approve subject to a section 106 agreement);
- Where a pending application is progressing well and/or permitted and the applicant/ developer has good track record of delivery

5.16 The Council will consider data submitted by developers and local agents when assessing lead-in times and build-out rates by year, taking into account a geographic spread of likely delivery. When no information is received, delivery information from previous years will be used to inform a delivery forecast. If no recent delivery information has been obtained, delivery assumptions will be applied. The assumptions for built out rates are set out in Newcastle's HELAA Methodology.<sup>1</sup>

### Windfall

5.17 NPPF (Paragraph 70) states that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens.

5.18 This is certainly the case in respect of small housing sites and the HELAA incorporates a small site windfall allowance based upon a conservative assumption that unidentified developments of fewer than 5 homes will continue to yield at least 50 completions per annum.

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<sup>1</sup> Newcastle City Council Housing and Employment Land Availability Assessments Draft Methodology November 2015  
[http://www.newcastle.gov.uk/sites/drupalncc.newcastle.gov.uk/files/wwwfileroot/planning-and-buildings/planning-policy/newcastle\\_helaa\\_draft\\_methodology.pdf](http://www.newcastle.gov.uk/sites/drupalncc.newcastle.gov.uk/files/wwwfileroot/planning-and-buildings/planning-policy/newcastle_helaa_draft_methodology.pdf)



5.19 Monitoring data (see Figure 24) demonstrates that Newcastle has delivered 298 dwellings on sites less than 5, over the period 2010-2015. Therefore the Council will take a conservative estimate that estimates that an average of 50 dwellings will come for each year through this source.

	<b>Sites with planning permission less than 5 dwellings.</b>
<b>2010/ 11</b>	64
<b>2011/ 12</b>	46
<b>2012/ 13</b>	61
<b>2013/ 14</b>	72
<b>2014/ 15</b>	55
<b>2015/ 16</b>	48
<b>2016/ 17</b>	36

Figure 24 Sites with planning permission for less than 5 dwellings.

#### Office conversion to residential:

5.20 On 30 May 2013 the government introduced a new policy (through the Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013) that gives permitted development rights for the conversion of offices (class B1a) to dwellings (class C3) without the need for an application for planning permission, through a prior approval system. Dwellings arising from this source have the potential to contribute to the supply.

#### Stage 4; Calculating Five Year Land Supply

5.21 Appendix 1 and 2 provides details of all sites and potential numbers that could be delivered each year. Figure 25 below provides a summary of the five year supply of deliverable housing sites based on a 5% buffer requirement. The information is based on monitoring data provided by Newcastle City Council.

The Council's five year land supply is set out in the following table:

	<b>Five year requirement</b>	Figure 21	<b>5400</b>
<b>a</b>	Five year requirement + 5%	Figure 23	5,670
<b>b</b>	The estimated five year supply	Figure 16	7,329
	Assumed Net adjustment (windfalls minus losses)	Figure 24	-180
<b>c</b>	Net supply		7,149
<b>d</b>	Five year supply as a percentage of requirement (including buffer)	$(c \div a) \times 100$	126.1%
<b>e</b>	<b>Five year supply (in years)</b>	$c \div (a \div 5)$	<b>6.3</b>

Figure 25- The Council's five year land supply

5.22 Figure 25 shows that the identified sites and student schemes are capable of delivering over 7,000 new or released dwellings, which exceeds the requirement (including 5% buffer). It demonstrates that the council has at least 6.3 years (rounded) or 126% supply of deliverable sites. If you discounted the requirement by making an adjustment for cumulative additional delivery over the plan target you would derive 14.8 years' worth of 5-year housing land supply.

5.23 **The council has identified sufficient deliverable sites to demonstrate 6.3 years' worth of housing.**

### Housing Supply Trajectory

5.24 The NPPF requires local planning authorities to prepare a housing trajectory. This provides a position statement comparing past performance on housing supply with anticipated future rates of housing development. It sets out the strategic housing requirements for the Plan period, past completion rates, projected future supply informed by the Housing Economic Land Availability Assessment (HELAA) and existing commitments and actual performance, identifying any under supply or over provision against targets. The trajectory covers a 15-year period from the current date, identifying deliverable sites for the five-year period and developable sites for the following ten years.

5.25 Trajectories are a forward planning tool, designed to support the plan, monitor and manage the approach to housing delivery by monitoring both past and anticipated completions across a period of time. To illustrate, if past completions show a shortfall against requirements, they can be used to demonstrate that future completions will make up this shortfall. Alternatively, as they look forwards as well as backwards, they can help indicate at an early stage whether any steps need to be taken to ensure planned requirements are met. Trajectories also provide a means of further exploring and understanding the various components of past and future housing supply.

5.26 The housing trajectory looks more long-term than the five-year land supply report, covering over 5 years of past completions (since the beginning of the Plan period) and projecting forward at least 15 years from the current date. The latest housing trajectory has been updated to include the findings of the latest residential monitoring exercise and a reassessment of the deliverability of HELAA sites.

5.27 The CSUCP sets out a requirement to deliver 17,000 (net) homes between 2010 and 2030. For the purposes of monitoring the overall requirement has been divided into delivery phases (Figure 26). The target figures for 2030/31 and onwards have been derived from DLUHC's published indicative local housing need for Newcastle as the plan period ends at 2030. This includes the 35% housing 'uplift' identified for Newcastle upon Tyne by the national PPG as one of the 20 most populated cities and urban areas.

	2010-15	2015-20	2020-25	2025-30	2030-35
<b>CSUCP Target (net)</b>	1400	4800	5400	5400	n/a
<b>Target (gross)</b>	2600	5100	5650	5650	7,105
<b>Per Annum (net)</b>	280	960	1080	1080	1,402

Figure 26 Core Strategy and Urban Core Plan Housing Targets

- 5.28 This trajectory draws on all of the evidence compiled as part of the HELAA process in forecasting future house building to 2030. A detailed analysis of delivery expected from sites in the next five years has been undertaken, through work to determine the 5-year housing land supply position, whilst delivery from all identified HELAA sites has been assessed and considered in order to give an overall forecast for delivery of new housing to 2030.
- 5.29 The first graph below (Figure 27) shows the expected delivery of new homes against the target set out in the CSUCP and DLUHCLocal Housing Need for the post plan period. The graph displays some peaks and troughs which in the next 5 years and is attributable to a combination of the now slowing pace of delivery of student accommodation and application of the deliverable definition of sites forecast to deliver new homes. In reality however, delivery and completions are likely to have less peaks and troughs as developers seek cumulatively to meet the level of anticipated demand. Furthermore, the peaks in the trajectory should be considered an element of non-delivery of planning permissions, hence the need for a buffer of sites. Recent Local Government Association research indicates a national implementation rate of just 58.5% for the period 2010/11 to 2019/20<sup>2</sup>. You will also note the reduced availability of identified suitable land from 2031/32 onwards, and reduced sufficiency of supply overall for the next 11-15 years ahead. It is expected that a call for sites will help to assess further sites coming forward.
- 5.30 The second graph (Fig. 28) displays the same supply trajectory data against a revised residual plan target, which has been adjusted to take into account past delivery over the plan target.

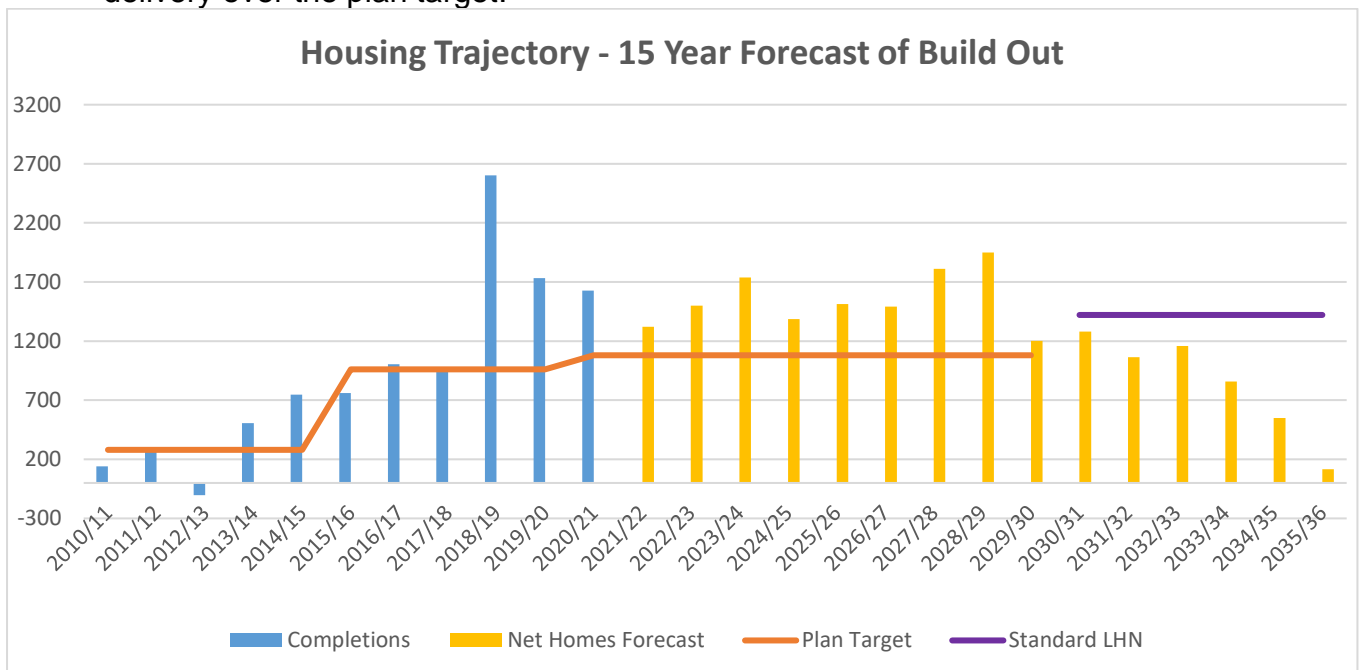


Figure 27 Core Strategy and Urban Core Plan Housing Trajectory

<sup>2</sup> <https://www.local.gov.uk/about/news/over-1-million-homes-planning-permission-waiting-be-built-new-lga-analysis> 8 May 2021

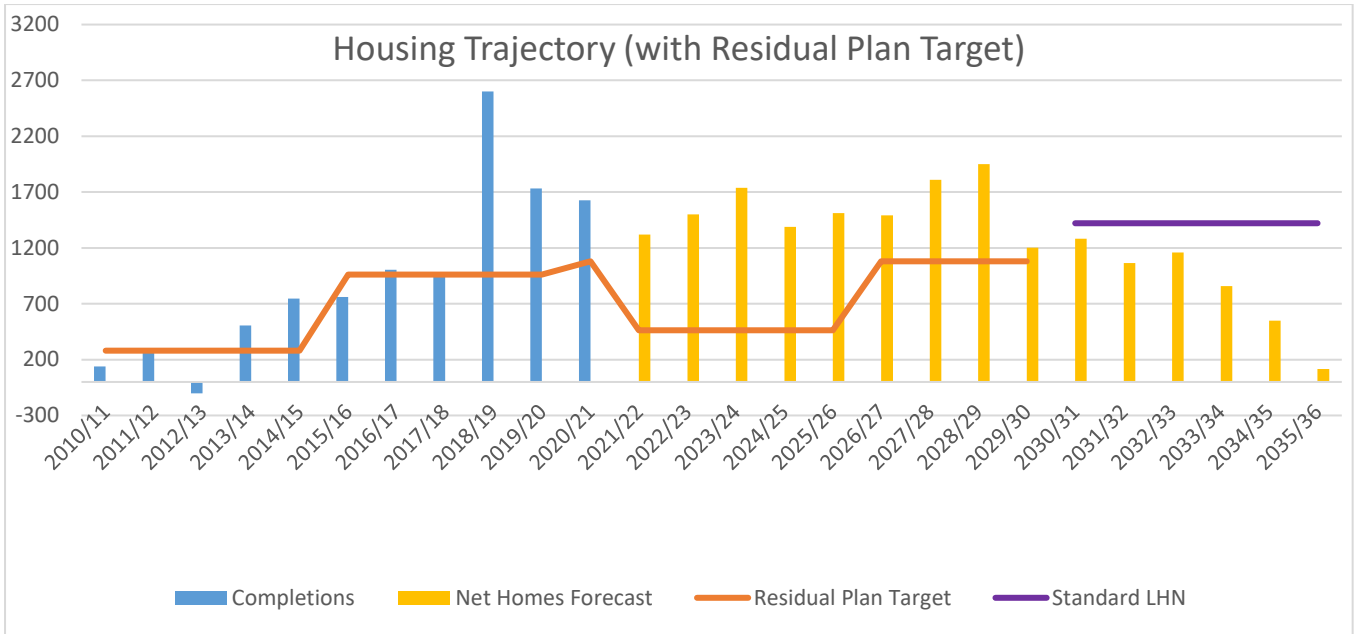


Figure 28 Core Strategy and Urban Core Plan Housing Trajectory ( with Residual Plan Target)