

## **Five Year Housing Land Position Statement and Housing Delivery Test – December 2021 Position Statement**

The government requires all local authorities to demonstrate a supply of specific deliverable sites to provide 5 years' worth of housing against a set housing requirement. The Housing Delivery Test is the mechanism to monitor housing deliver against the government target for each local authority.

Either or both need to be met to avoid current NPPF presumption in favour of sustainable development and risk of losing appeals as policies, particularly on protected open land are ruled out of date and therefore carry limited weight.

The five-year housing land supply is an evolving figure as new sites come into supply and supply diminishes as completion take place. The balance therefore needs to be at least five years against requirements.

### **Five-year requirement**

The five-year requirement is set out in an adopted Development or Local Plan or using the government's standard method, which is based on household projections, adjusted for affordability.

For Bolton until adoption of the Places for Everyone or a subsequent Local Plan, the annual requirement using the government's standard method is 776.

### **Five-year supply**

Bolton's Authority Monitoring report for 2019/20 showed a supply of deliverable sites of 3.9 years. In the intervening time the council's position has improved with planning approvals of several major residential schemes. The current position is that Bolton's 5-year supply of deliverable sites is now closer to the required 5-year position, being estimated at 4.8 years, though this is likely to drop down again as forthcoming completions are monitored over coming weeks. This figure is subject to the completions data as of September 21, and with several sites with outline permission with supporting evidence of deliver contributing to the supply.

Consequence: Presumption in favour of sustainable development applies if the supply is under 5 years and is vulnerable to challenge if not substantially above this. It is suggested that a supply of 5.5 years on up would be sufficient to demonstrate a deliverable 5-year supply, taking into account completions and schemes falling away.

### **Housing Delivery Test position**

The results of the 2020 Housing Delivery Test published in January 2021 showed that Bolton had delivered 66% of the annual housing requirement. The 2021 results have not yet been published but will include a four-month adjustment to account for disruption caused by Covid-19.

Consequences: Bolton must prepare a Housing Delivery Test Action Plan, add 20% requirement to 5-year supply and determine planning applications in line with presumption of sustainable development.

### **More regular monitoring of the five-year supply**

To report the five-year housing supply at more regular intervals with the intention to report in April (to tie in with annual monitoring), July, October, and January/February.

### **Next quarter**

To maintain and progress the five-year supply position with additional information on delivery rates and completions, and with decisions to be made on several large planning applications awaiting determination.

## **Risks**

- 5-year supply is a snapshot with completed schemes exiting the supply as new schemes are approved and added.
- Significant completion for example of high-density schemes will result in significant falls in deliverable sites unless more are either approved, outlines progress to reserved matters and into delivery or additional land, for example through council disposals proceeds.
- Developer challenges to assumptions, delivery rates, starts etc, being mitigated by more ongoing engagement with developers and submission of delivery statements.