



## **Cornwall Monitoring Report**

# **Cornwall 5 Year Housing Land Supply Statement**

**15<sup>th</sup> June 2021**

**Table of Contents****Page**

<b>1:</b>	<b>Introduction</b>	<b>1</b>
<b>2:</b>	<b>Establishing the Five Year Requirement</b>	<b>1</b>
<b>3:</b>	<b>Calculating the Supply</b>	<b>10</b>
<b>4:</b>	<b>Conclusion</b>	<b>23</b>

**Appendix 1: Cornwall Housing Trajectory 1<sup>st</sup> April 2021**

**Appendix 2: Summary Housing Trajectory Tables 2021**

**Appendix 3: Cornwall Housing Trajectory Lead in Times and Delivery Rates Methodology**

**Appendix 4: Schedule of Outline Planning Permissions with evidence that are considered deliverable**



## IMPORTANT NOTES

### CORONA VIRUS

It is undeniable that COVID-19 has had a considerable consequence for the planning and housing sector, though at the time of writing (May 2021) the government is on track to lift all remaining restrictions by the end of July.

However the continued impact of the COVID crisis and the medium to long term associated effects on the housing market is not yet known or calculable. While the many problems COVID has introduced to the planning and housing markets have undeniably made housing delivery more difficult over the past year, it has also more recently resulted in a considerable boost in housing interest in rural areas such as Cornwall.

At the time of writing, the MHCLG have not revised any guidance in relation to the 5 Year Supply. While it would be difficult to see how the measure could remain a robust indication of a Local Authorities ability to deliver enough homes should it fail on this measure; housebuilding will remain a crucial component of our recovery and so we must continue to focus on the delivery of homes to meet housing needs. At the time of writing, the majority of the working population have been vaccinated, the lockdown has ended and the government is confident all national restrictions should be lifted by summer. With this in mind, there have been no adjustments to the 5 year supply methodology on this basis this year. However, the likely impact the virus has had to date and the context in which this measure of housing delivery continues to take place should not be ignored.

### RIVER CAMEL SPECIAL AREA OF CONSERVATION

The River Camel Special Area of Conservation is designated under the [Habitat Regulations 2017](#). The SAC covers 69km and includes headwaters of the Camel and De Lank rivers and their joining with the River Allen. The [area](#) extends from:

- between Camelford and Tintagel in the north
- following close to the A30 from Bolventor to Bodmin
- and just south of the A30 from Bodmin to Roche
- to parts of St Breock downs and between Wadebridge and Egloshayle in the west of the area.

You can view more information using these links: [River Camel Designated Area of Conservation](#), and Cornwall Council's webpage: [Temporary pause on development in the River Camel Special Area of Conservation - Cornwall Council](#)

The reasons for this area being a Special Area of Conservation are the populations of:

- Bullhead (*Cottus gobio*)
- Otter (*Lutra lutra*)
- Atlantic salmon (*Salmo salar*).

Cornwall Council has received a [letter from Natural England](#) about the levels of phosphates in the River Camel. Natural England considers the River Camel SAC to be at risk from the effects of eutrophication. Excessive phosphates cause eutrophication. Current mitigation measures will not reduce nutrient levels enough.

Impacts and a temporary pausing of development in the River Camel catchment area

A nutrient neutral approach to development is needed to avoid direct and indirect adverse impact on the River Camel SAC. We are:

- reviewing advice from Natural England
- seeking legal advice.

#### **What this means for current planning applications**

The Council is taking precautions by pausing decision making in the River Camel catchment area. We cannot approve new developments unless they can show they are nutrient neutral.

#### **What this means for the 5YHLS**

As we cannot approve new developments in the area, development will be constrained and our capacity to deliver homes in the short to medium term will be reduced. The scale of delay to housing delivery this will represent cannot be known at this stage, but estimates are currently that delivery will likely be constrained over a period of 1 to 3 years. The council has concluded that given these estimates, a reasonably robust approach would be to ensure no effected sites in the catchment will be included towards the first two years of the five year supply.

The effects on planning permissions already approved will differ depending on the age and stage of each site. To account for this, we have made the following adjustments to our traditional 5YHLS methodology for sites within the catchment:

Any projected delivery of homes in the next two years from Local Plan allocated sites and large sites with Outline or Permission in Principle will be pushed back, so that no homes are projected to deliver within the first two years of the five year supply.

On large sites - full, outline, reserved matters, discharge of condition or Section 73 applications which would result in new residential use are all assumed to be effected by the River Camel issue. No homes are projected to come forward within the first two years on these sites.

The assumption is made that all small sites of less than 10 homes are effected, and no delivery will be projected for these homes within the first two years of the 5YHLS. Though it is likely that many of these homes will in practice come forward without issue, applying this blanket reduction allows our estimates to remain cautious. As delivery on small sites is typically aggregated, discounted by 10% and delivery then projected at a flat rate across a 5 year period (to eliminate any artificial 'spike' from small sites in years 1 and 2); delivery on small sites within the River Camel catchment will mirror this method, but with delivery instead projecting to begin at year 3 as opposed year 1, effectively further discounting the first 2 years of the 5 year supply.

## 2021 Housing Land Supply

### 1 Introduction

- 1.1 Paragraph 73 of the revised National Planning Policy Framework (NPPF) (February 2019) requires local authorities to identify and update annually a supply of specific deliverable sites sufficient to provide 5 years worth of housing against their housing requirements. This report establishes the position as at 31<sup>st</sup> March 2021 in relation to whether or not there is a 5 year supply of land for housing in Cornwall. The Cornwall Local Plan was adopted on 22<sup>nd</sup> November 2016 and the adequacy of the housing supply has been assessed against the adopted Local Plan housing requirement, representing the most up to date assessment of housing need in Cornwall.

### 2 Establishing the Five Year Requirement

- 2.1 The Cornwall Local Plan establishes a housing requirement of 52,500 homes between 2010 and 2030 at 2,625 per annum. As the Local Plan is less than 5 years old the NPPF makes clear in [paragraph 73](#) that it is the Local Plan housing requirement that should be used as the basis for calculating the 5 year supply.
- 2.2 The Local Plan identifies a separate housing requirement for Gypsy and Traveller provision and the provision of bed-spaces in communal establishments for older persons. The overall housing requirement also does not include the provision of purpose built student accommodation. These three elements of supply have therefore not been included in any assessment of the housing supply that meets this requirement.
- 2.3 The Council's position is that the Local Plan housing requirement of 52,500 can therefore now be given full weight.

#### Completions and the Historic Record of Delivery

- 2.4 There were 2,677 completions during the year 2020/21. Since the start of the plan period there have been 29,313 completions at an average of 2,665 per year. This represents an over provision of 438 homes over the plan period when compared to the proposed Local Plan housing requirement of 2,625 per year, or 28,875 over 11 years. This means that to date the plan requirement has been met. The surplus in supply means that as last year, there is no shortfall to add to 5 year requirement this year (that would require this be met within 5 years), as advocated by Planning Practice Guidance (PPG).
- 2.5 Table 1 below sets out the annual completions achieved since the beginning of the plan period (2010). This table also shows how the stock of planning consents either not started or under construction that are available for development has increased significantly from 12,943 in 2010 to 27,330 in 2021.

**Table 1: Completions 2010-2021**

Year	Completions	Number of Homes with Planning Permission
1 <sup>st</sup> April 2010 – Start of the Plan	-	12,943
2010/11	2,060	13,518
2011/12	2,375	15,097
2012/13	2,278	15,520
2013/14	2,040	18,978
2014/15	2,702	20,380
2015/16	2,536	21,752
2016/17	3,074	26,347
2017/18	3,429	27,966
2018/19	3,114	30,025
2019/20	3,028	27,933
2020/21	2,677	27,330

**Housing Delivery Test**

- 2.6 The government have introduced the Housing Delivery Test to determine a local authorities' performance in terms of meeting its housing need. This test will be used to determine the appropriate buffer to be applied to the 5 year supply assessment. The results of the Housing Delivery Test for each local authority will be typically be published by the government in February each year.
- 2.7 If housing delivery falls short of the housing requirement, then a series of measures will apply depending upon the shortfall.
- 2.8 If delivery falls below 95% then an Action Plan must be published. If it is below 85% then a 20% buffer should be added to the 5 year supply. Finally, if delivery falls below 75% then there is a presumption in favour of sustainable development.
- 2.9 There are however transitional arrangements in place to the latter measure, whereby the presumption in favour of sustainable development will only apply where delivery falls below 45% following publication of Housing Delivery Test in 2019; and then 75% in all subsequent years.
- 2.10 Further details of the Housing Delivery Test and its implications are contained within the PPG.
- 2.11 The method for calculating the Housing Delivery Test measurement is set out in the Housing Delivery Test Measurement Rule Book. It is a percentage measurement of the net number of homes delivered against the net number of homes required. Where, as in Cornwall's case, the Local Plan is less than five years old, the net number of homes required is the lower of the adopted local plan annual housing requirement and the minimum annual local housing need figure. This is calculated using the standard method for calculating housing need set out in national guidance. Delivery is assessed against the previous three year period.

- 2.12 The following sets out the transitional arrangements using household projections that will be required until 2021. As the calculated need using household projections data is lower than the Local Plan annual requirement of 2,625, it is this figure that is used in the delivery test requirement. The following is a provisional representation of the test, as adjustments for communal accommodation must also be applied once these figures are finalised later in the year. However, it is reasonable to assume given the scale of adjustments in previous years that this figure is only likely to change by up to 2%.

**Table 2: Housing Delivery Test Calculation**

Year	Source	Calc. Need	Comps
2018-19	Minimum Annual Local Housing Need Figure, including uplift for Gypsy and Traveller provision	2,647	3,131
2019-20	Minimum Annual Local Housing Need Figure, including uplift for Gypsy and Traveller provision	2,423	3,103
2020-21	Minimum Annual Local Housing Need Figure, including uplift for Gypsy and Traveller provision	2,647	2,677
Estimated Total for 2020-2021 test		7,717	8,911
Estimated Housing Delivery Test Percentage		115%	

- 2.13 The above illustrates that housing completions over the last three years have exceeded the calculation of need and therefore Cornwall Council as it stands can be seen to have passed the Housing Delivery Test; delivering 115% of the calculated requirement. As above, it is important to note these figures exclude any adjustments for student accommodation or communal accommodation for the elderly (C2 uses) that will be made later in the year. However given the data it is safe to assume the test will be comfortably passed once any adjustments have been made.
- 2.14 It is clear from the above delivery on this measure Cornwall has exceeded need and therefore no measures designed to deal with under supply are applicable. Therefore a 5% buffer should be applied to the 5 year supply.

#### **Annual Position Statement**

- 2.15 The revised NPPF and associated PPG gives local authorities the option to have their 5 year supply inspected on an annual basis. If this option is to be taken up then a 10% buffer is to be applied to their 5 year supply. However, the NPPF and PPG makes clear that in order to do this local planning authorities will have to have had their 5 year supply initially confirmed through the examination of their local plan. In Cornwall's case the Inspector concluded that it was not necessary for him to establish whether there was a 5 year supply in order to find the Local Plan sound, and it was therefore not examined. This means that the option of having an Annual Position Statement examined in this way is not open to Cornwall Council.



- 2.16 Table 3 below provides a summary of the 5 year housing requirement with a 5% buffer. For the reasons stated above, a 5% buffer is considered appropriate when assessing the adequacy of supply resulting in a 5 year requirement against a 52,500 target of 13,781.

**Table 3: 5 Year Housing Requirement**

Plan Requirement	52,500 (2,625 pa)
5 Year requirement (2,625 x 5)	13,125
Plus any identified shortfall (28,875 – 29,313)*	N/A (438 surplus)
5 year requirement plus 5% buffer	13,781
<b>5 Year requirement</b>	<b>13,781</b>

\* A shortfall would be the difference between the minimum expected completions since the beginning of the plan period less actual completions. Any shortfall is added to the 5 year requirement on the basis that it should be made up within five years rather than the remainder of the plan period. The buffer (5% and 20%) is then applied to this revised requirement. There is no shortfall in supply in 20/21

### 3 Calculating the Supply

- 3.1 To be considered as contributing to the 5 year supply a site must be deliverable. This is defined in the glossary of the NPPF as follows:

***Deliverable:*** *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. 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.*

- 3.2 Cornwall Council interpret this definition to mean that small sites (of less than 10 dwellings) with either outline or full permission, and major sites (10 dwellings or more) with full planning permission are considered to be deliverable unless there is clear evidence to demonstrate that they are not. Large sites of 10 or more dwellings with outline permission or are allocated in a Local Plan should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- 3.3 The following outlines the methodology for demonstrating the deliverability of firstly sites with planning permission, and then other sites that are considered wholly or in part

deliverable within the next five years. A spreadsheet showing details of the expected delivery from all sources of supply is included at Appendix 1.

### **Planning Permissions**

- 3.4 As at 31<sup>st</sup> March 2021 there was planning permission for 27,330 homes. As shown in Table 1 above, this supply remains at similar levels to last year and represents a significant increase in the available supply when compared to the start of the plan period.
- 3.5 For the purposes of assessing deliverability, sites with permission have been broken down into sites below 10 units (small sites) and larger sites of 10 units or more.

### **Small sites 1-9 units (deliverable supply – 5,428)**

- 3.6 Previous work across Cornwall based on sites granted permission in 2005 established that 82% of such sites were developed within five years. This resulted in an 18% discount rate for non-delivery within five years being applied to current permissions. This was based upon information from four of the six former districts on permissions granted in one year that were developed within five years.
- 3.7 As we are now 11 years into the plan period it is possible to use more robust data to check whether this is still the case. As at April 2010 there was planning permission for 4,649 homes on small sites. In fact 4,232 homes were built on small sites in the following five years (table 4 below), which is equivalent to 90% of all commitments and represents 846 per year. On this basis a 10% discount is applied to permissions on small sites to allow for the fact that some of these permissions will not be delivered within five years. To support this discount it has since become possible to determine how many homes were delivered on small sites compared to the number that had permission five years previously. This work demonstrated that in 2013 there were 4,104 homes with permission on small sites, whereas in the following five years 4,827 homes were actually built on small sites. This would suggest that the application of a discount to small sites is a cautious approach as it appears that currently more homes are actually delivered on small sites than had permission at a given point in time. However it must be recognised that a 10% discount is still appropriate to take account of the fact that some permissions on small sites are allowed to expire and are never developed. It also justifies including small sites with outline permission as deliverable as to exclude them would significantly under estimate the delivery of homes on small sites in Cornwall.
- 3.8 As at 31<sup>st</sup> March 2021 there was planning permission for 6,130 homes on sites below 10 units. A 10% discount for non-delivery within five years would typically be applied to these permissions to give an estimated yield from this source of 5,517 dwellings over five years. However, this year further complications were introduced. The emerging issue with the River Camel has meant that our methodology should further reduce projections for homes on small sites if they fall within in the catchment. Therefore while the issue persists the Council's approach is to split small site projections in two steams. Homes permissioned outside of the catchment will be projected forwards using the discounted methodology outlined above, and assumed to deliver at an even rate across the next 5 years. However for homes that fall within the catchment, no homes can be projected to come forward in the first 2 years due to the

ongoing Phosphates issue. In this case, delivery on these sites has been shunted forwards, to deliver at a flat rate across years 3 to 7 as opposed 1 to 5, with the 10% discount still in effect.

- 3.9 Additionally, to ensure our estimates are consistent with other methods of reporting, these calculations have taken place at Local Plan Target Area level and have then aggregated up to Cornwall level. This means a projections on small sites will likely be reduced again by a handful, as doing this calculation at an aggregated level first means some discounted homes will be rounded down before being summed at Cornwall level.
- 3.9 Given the revised approach to small site projections to account for the River Camel issue, **5,428** homes have been projected to come forward on sites of this size over the next 5 years. Note that this is a significant reduction from the permitted 6,130 homes permitted, but this cautious approach will allow estimates to be more robust.

**Table 4: Completions on small sites (1-9) during plan period**

10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	Total
748	924	875	859	826	995	1,101	1,046	1,045	1,052	1,057	10,526

- 3.10 Previous housing land assessments included information obtained from developers to establish when they expected sites to commence development and at what annual rate they expected to deliver them. Where developers were not able to be contacted then informed views of officers were sought. Due to the considerable number of sites in Cornwall and the fact that the number of sites is increasing, this approach often delays the publication of the annual housing land supply statement. In addition, it has been suggested at planning appeals that the views of developers may be overly optimistic in many cases. As a result Cornwall Council have undertaken analysis of average lead in times (from point of approval of planning permission to the first completed dwelling) and average delivery rates based on an analysis of sites granted permission on or after April 2010 together with sites under construction in 2010. The detailed methodology is included in the appendices. The results show that for sites of between 10 and 49 dwellings the average lead in time from a granted permission to delivery of the first dwelling is 2.5 years, and the average delivery rate from then on is 39 dwellings per year. For sites of between 50 and 99 dwellings the lead in time is 2 years and average delivery is 30 dwellings per year. For larger sites of 100 or more dwellings, the average lead in time is 1.5 years with 35 dwellings completed per year thereafter. The survey was based upon activity during a period of recession, and build rates in particular are likely to be a little conservative.
- 3.11 The sample used in the above analysis only included sites with full planning permission. Additional work was therefore undertaken to establish the average time between the granting of outline permissions and the approval of reserved matters. This showed that the average time between granting an outline permission and the approval of reserved matters ranges from 20 months for sites 10-49; 21 months for 50-99; and 24 months for 100+. These additional lead in times have been added to the lead in times for full permissions to give the following lead in times from outline permission to completion of the first dwelling - 4.2 years for sites of 10-49; 3.75 years for sites 50-99 and 3.5 years for sites of 100 or more.

- 3.12 This approach does result in some sites appearing to show unrealistic rates of delivery in the detailed housing trajectory. It is important to note however that these are average rates and so therefore some sites will show overly optimistic delivery whilst others will show an overly pessimistic forecast. The application of an average rate also appears to show overall very high expected completions in the first couple of years with building rates falling as the five year period progresses. The trajectories are however not an attempt to predict future annual build rates but rather to assess the availability of sites that could deliver homes over the next five years. It is far better therefore when viewing the trajectories to look at the overall expected delivery over the full five year period.
- 3.13 The use of average rates mean that it would not be appropriate to adjust either the lead in time or delivery rates for individual sites to reflect individual circumstances because just as there will be circumstances where sites are delayed and delivering fewer dwellings than expected, there will equally be others that deliver sooner and at above average rates. Therefore, should attempts be made to challenge the delivery on some individual sites as being overly optimistic this would produce an unbalanced view of delivery on a county wide basis as it would have to be countered by adjusting sites that underestimate delivery and lead in times. Notwithstanding, further work has been undertaken in assessing expected delivery of the largest sites and identifying specific sites where development may have stalled. This has resulted in further adjustments by reducing the yield on some sites from that indicated by average rates and excluding some sites from the 5 year supply all together. This process has included, wherever possible, contacting developers of sites of 300 or more dwellings to obtain their input regarding expected commencement and delivery rates. Additionally for some of the largest sites of over 500 dwellings, delivery rates have been increased where it is expected that more than one developer is likely to be operating from the site at the same time. The sample for the calculation of the average rates did not include any sites over 500 units and therefore it is unaffected by this change.
- 3.14 In some areas where there are a number of permissions relating to a large area, the delivery from each site or group of sites has been assessed individually to recognise that these sites may be developed in phases or by more than one developer at the same time. These sites are generally over 300 units but may sometimes include smaller sites where sites have been split into phases. This has resulted in the delivery from some permissions being pushed back to commence upon the completion of an earlier phase, or delivery being increased on a site to take account of the expectation of more than one developer operating from a site at the same time.
- 3.15 Following the publication of the revised NPPF and update to the PPG, the definition of deliverable has changed so that major sites (10 or more dwellings) with outline planning permission should not be considered as deliverable unless there is clear evidence to demonstrate that housing completions will begin on site within five years. All sites with outline permission for 10 or more homes have been assessed to provide evidence that the site is being progressed and that there is every likelihood that housing completions will begin within five years. Where sites have recently been granted outline planning permission Cornwall Council rely on its evidence of average lead in times and delivery rates as providing clear evidence that homes will be delivered on these sites within five years. Appendix 3 provides the

evidence for each site with outline permission of 10 homes or more that are considered deliverable. Together these outline permissions are capable of providing 2,620 homes within five years.

A further assessment has been undertaken to identify whether there are any sites with permission where for various reasons there is clear evidence that they will not be delivered within five years. A number of sites with a valid permission have been excluded on this basis. This includes those sites that are considered to have stalled. These are listed in the following Table 5. This amounts to a reduction of 1,965 dwellings that would have been identified as deliverable within five years when applying average lead in times and delivery rates.

**Table 5: Planning Permissions not considered to be deliverable**

Planning App Ref	ADDRESS	Evidence	Deduction in 5YHLS
PA12/12115	Land South Of Priory Road Priory Road Bodmin Cornwall	Persimmon developing site north of Priory Road. However there are no recent applications re the area to the south of the road and no evidence it will deliver within 5 years	298
PA18/01390	Binhamy Binhamy Road Stratton Bude EX23 9TG	There has been no RM submitted or progress on this permission and no evidence it will deliver within 5 years	20
PA17/04068	Land At Tuckingmill/Church View Farm Camborne Cornwall	While a medium term site start is anticipated, there has been no recent progress	167
PA15/02623	Land At Tuckingmill/Church View Farm Camborne Cornwall	It is considered that this development is unlikely to deliver in the short term. It doubtful the developers will be able to discharge all the conditions in time in view of the challenging issues involved, and the need to complete a 106.	93
PA17/09966	Land NE Of Tesco Foundry Road Camborne Cornwall	There has been no progress or RM submitted and no evidence it will deliver within 5 years	42
PA16/04157	Valley Motors Gas Lane Tolvaddon Camborne Cornwall TR14 0BJ	There has been no progress or RM submitted and no evidence it will deliver within 5 years	24

<b>W2/PA08/01877/FM</b>	Former Charles Andrew Clinic West End Redruth Cornwall TR15 2SF	This is the residual undeveloped part of the application with no recent planning history	37
<b>PA12/09717</b>	Land At Tolgus Tolgus Redruth Cornwall TR15 3SS	RM PA20/02195 for the first phase has been approved. The case officer states that the developers are intending to commence phase 1 this year, but he considers that it may be some years before the next phase is begun. No evidence it will deliver within 5 years	100
<b>PA17/07443</b>	Land East Of Roughtor Drive High Street Camelford	There has not been a reserved matters application submitted or any evidence of the site coming forward within 5 years	40
<b>PA16/00001</b>	Land Adjacent To Clodgy Lane And Gay's Hill Helston Cornwall	The case officer reports that not much has happened and a reserved matter application is still awaited. However they are looking at addressing conditions such as archaeology so there is some movement. An RM application is expected to keep the permission alive but it is unsure how much housing if any would be delivered within 5 years.	157
<b>PA18/02377</b>	Cross Lanes Farm Cross Lanes St Stephens Launceston Cornwall PL15 8JS	There has been no progress or RM submitted and no evidence it will deliver within 5 years	16
<b>PA17/08162</b>	Land South Of Cedar Grange St Marys Road St Stephens Launceston Cornwall	There has been no progress or RM submitted and no evidence it will deliver within 5 years	30
<b>PA12/08912</b>	Trevithick Manor Farm Trevemper Newquay TR8 4QD	While there has been progress on the wider Trevithick Manor site, there has been no progress on this specific application.	11

<b>PA15/04171</b>	Land At Chapel Gover Newquay Growth Area Newquay	There has been no RM submitted. However the sites forms part of the wider Nansledan area, much of which is currently being developed. Adopted masterplan provides certainty to future Reserved Matters applications. However there is no evidence to show that development will commence within 5 years	274
<b>W1/07/P/0075</b>	Stanmore Hotel Site & Cattrans Coal Yard Site Alexandra Road Wherrytown	No current activity. Part of site lost to Lidl's car park, so unlikely to deliver this level of development	40
<b>W1/90/P/0668</b>	Taylor's Garage Site Coinagehall Street Penzance	The site is allocated in DPD for mixed use. It is a Council owned site and there is current activity forming part of the High Street funding bid. It is possible the development will not include any residential	55
<b>W1/66/P/217630</b>	The Coombe Newlyn	Residual outline. No current activity. Request for TPO not granted in 2016	21
<b>PA11/02991</b>	W Harvey & Sons The Coombe Newlyn Penzance Cornwall TR18 5HF	Though a material start has been confirmed, there is no current activity or reason to consider that this development is likely to deliver within 5 years	14
<b>PA17/07522</b>	Land West Of Penpont View Altarnun Launceston Cornwall	There has been no progress or RM submitted and no evidence it will deliver within 5 years	12
<b>PA16/03065</b>	Land At Nancegollan Helston Cornwall	There has been no progress or RM submitted and no evidence it will deliver within 5 years	19
<b>PA17/04940</b>	Land At Keveral Gardens Seaton Cornwall	There has been no recent activity on the site.	10

<b>PA17/06153</b>	Land East Of Rosecott Park Rosecott Park Kilkhampton Bude Cornwall EX23 9QG	There has been no progress or RM submitted and no evidence it will deliver within 5 years	25
<b>PA15/07114</b>	Penhale Camp Camp Road Holywell Bay Newquay Cornwall TR8 5PF	Currently stalled due to significant offsite infrastructure costs. However NMA PA21/01865 was submitted (and found not acceptable) in 2021	134
<b>PA16/04955</b>	Land North Of Mountlea Drive Mountside Road Par Cornwall	There has been no recent activity on this site that would provide any evidence of deliverability within 5 years	103
<b>PA16/03215</b>	Land North Of Broad Park Close Broad Park Close St Minver Wadebridge Cornwall PL27 6JP	There has been no progress or RM submitted and no evidence it will deliver within 5 years	22
<b>E2/09/00575/FUL</b>	Land Pt Os 4966 East Taphouse Cornwall	The Council are no longer interested in the site, there no longer seems to be a housing need to support the delivery of the scheme and therefore we can assume at this time it is very much a stalled site.	28
<b>PA18/02240</b>	Land South East Of Rose Meadows Molinnis Road Bugle Cornwall PL26 8QJ	There has been no progress or RM submitted and no evidence it will deliver within 5 years	10
<b>PA17/03432</b>	Land South Of Annears Garage Tywardreath Highway Par Cornwall	While there is a Reserved matters application pending, it is still unknown whether development will proceed within 5 years	10
<b>PA17/08118</b>	Land South East Of Gratton Cottages Oak Lane Whitstone Holsworthy Cornwall EX22 6TH	There has been no progress or RM submitted and no evidence it will deliver within 5 years	16



<b>W1/89/P/1079</b>	Carbis Bay Hotel Beach Road Carbis Bay St Ives Cornwall TR26 2NW	While there has been a material start to this development (back in 1990) subsequent permissions around the wider site for the extension of the holiday facilities would appear to have made the implementation of this permission unlikely in the short term	28
<b>PA15/02691</b>	Carbis Bay Holiday Park (Site B) Laity Lane Carbis Bay Cornwall	While there is a pending reserved matters application for this site, there is no information at present to suggest that development will be delivered within 5 years	49
<b>PA15/10302</b>	Carbis Bay Holiday Park Laity Lane Carbis Bay Cornwall TR26 3HW	While some conditions have been discharged and a material start has been recorded, there has been no progress on delivery of the site	34
<b>C1/PA03/2340/06/M</b>	The Former Site Of Tregolls House Tregolls Road Truro TR1 1PX	There has been no activity regarding this residual part of a larger application	14
<b>PA16/04611</b>	Land At Bradfords Quay Bradfords Quay Wadebridge Cornwall	Conditions have been discharged PA20/03170, however no work has been undertaken, so the site is still considered stalled	12

**Total Deduction from 5  
Year Supply: 1,965**

3.16 The housing trajectory at Appendix 1 provides a breakdown of all sites with planning permission and how many are considered deliverable within five years. The following table sets out the number of dwellings expected to be delivered within five years when applying the average lead in times and delivery rates, and through a further assessment to exclude stalled sites and outline permissions on large sites where there is no evidence that they are deliverable within five years. Note that the number of small sites expected to be delivered will differ slightly from the trajectory figures due to rounding.

**Table 6 - Expected delivery within 5 years from sites with planning permission**

Source	Total number of homes with permission	Number expected to be delivered within 5 years
Small sites (1-9) with permission	6,130	5,428
Large Sites (10+) with permission	21,200	11,782
	27,330	17,210

- 3.17 This process has resulted in the total yield from planning permissions on sites of 10 or more being reduced considerably to allow for non-delivery within five years by applying average lead in times, delivery rates and the exclusion of sites that are currently considered undeliverable within the next five years.
- 3.18 It is not considered that any further discount is appropriate as the aim is to ensure that sufficient land is available that is capable of being developed within five years, and as such the figures have already been discounted for non-delivery within five years to allow for this. Furthermore circumstances do change and sites that stall will on the whole be allowed to expire and will be removed from the stock of permissions each year. Similarly, new unidentified sites will emerge and be included in subsequent years' housing supply assessments. Any attempt therefore to apply a blanket discount to large sites with planning permission would be double discounting as such a discount has already been made by discounting specific sites where it is estimated they will not deliver homes as expected.
- 3.19 What is clear from Table 1 above is that before any discount for non-delivery within five years is applied, there was planning permission for 12,943 homes in 2010, whereas in fact 11,455 homes were built in the following five years. Therefore, 90% of the supply in 2010 actually translated into completions five years later. On this basis, the reduction of the current supply of planning permissions from 27,330 to 17,210 represents a significant reduction for non-delivery within five years.

#### **Other Sources**

- 3.20 The following is an assessment of major sites (of 10 or more dwellings) that whilst not benefitting from detailed planning permission are considered capable of delivering homes within the next five years. In each case evidence is provided to support this.
- i) Large Sites granted planning permission in principle subject to the signing of a section 106 agreement (deliverable supply – 50)**
- 3.21 The following schedule identifies those sites granted planning permission that are awaiting the signing of a S106 agreement. In these cases the average lead in times have been increased based on an estimate in each case of when the S106 is likely to be signed following discussions with officers. The same average lead in times and build rates for outline and full permissions for a site of this size has then been applied as in accordance with the methodology in the appendices. The inclusion of these sites is justified on the basis that although new permissions

granted since April have not been included, these sites can be included in their own right as sites granted permission in principle 'subject to a S106 prior to 1<sup>st</sup> April 2021', and their inclusion is then borne out by the subsequent signing of the agreement and issuing of the decision. While typically a number of sites fall into this category in a given year, in 2020/21 there was just a single large site awaiting signing of a S106. Details of the site are provided below.

**Table 7: Sites with planning permission awaiting the signing of a S106**

Site	Total Capacity	Yield in 5 years	Justification / Evidence
Outline permission (with all matters reserved except for access) for up to 150 dwellings including children's play area, public open space, supporting infrastructure and associated works. (PA18/09982)	150	50	Outline planning permission with Committee approval subject to completion of a s106 (05/10/2020).

**ii) Sites proposed in the Site Allocations DPD (1,336 dwellings)**

3.22 A Site Allocations Development Plan Document (DPD) has been prepared, has concluded its examination process, and was found sound. Detailed evidence on the delivery of the site allocations was put before the inspectors for their consideration and accepted. The Council has used this evidence as a baseline for the assessment of the Council's 5 year supply position, but updated this, where appropriate, to reflect any more recent information. A summary of the position is set out below for each of the allocations expected to deliver homes within five years.

**Table 8: Local Plan Allocations that are progressing in advance of the Local Plan**

Site	Site Capacity	Justification	5YHLS
Halgavor Urban Extension West (Bd-UE2a)	540	Cornwall Council owns part of the site and has recently acquired some additional land within the site. The site has been identified as a priority for the Council's emerging housing programme and will be seeking to bring forward an application. Furthermore, the majority of the remaining land is within a single ownership and Wainhomes has now secured an option on the land and they are currently undertaking masterplanning work. Property currently in negotiations with Wain Homes over the access and the Council land to the East of the site. Treveth have looked at the site but are not currently interested. Stalled due to River Camel SAC	122

St Lawrences Urban Extension (Bd-UE3)	780	Full site capacity 780. 709 unpermissioned. Pending outline application (PA19/07457) on a part of the site for approximately 90 units	89
Castle Street (Bd- M1)	150	Application PA20/07691 pending for residential development of 170 dwellings	140
Tolgus Urban Extension (CPIR-UE1)	280	Masterplanning for the site already undertaken. Landowner for part of the site is working with a developer to bring forward a scheme, with a planning application expected later this year. Core highway works adjacent to the site, required to enable delivery, has already been implemented, including the main access works into the site	29
North Pill (SLT-H1 )	85	Initial discussions have begun in relation to bringing forward a self build housing scheme on this site.	15
Falmouth North (FP- H2)	300	The Site is within single ownership and has already been subject to a significant amount of masterplanning by the landowners' consultants. The owners have also entered into pre-application discussions with Cornwall Council, which has resulted in favourable feedback. Planning application (PA17/12164) has been submitted . Delegated Approval subject to the completion of the Section 106 Agreement which is in negotiation with the Councils Legal Department.	122
Kergilliack (phase 2) (FP-H3)	96	Part of site is under construction (see pp) Pending detailed application for 138 dwellings PA19/10381 by national housebuilders Barratt David Wilson Homes.	17
Kernick Road, Penryn (FP-M1)	100	The majority of the allocated site has planning permission. There is a new pending pre-application for 92 dwellings	25
Falmouth Road (FP- H4)	210	Owners currently in Legals with a third party with the intention to exchange for a mixed use scheme.	52

Trevassack (H-UE1)	1000	Planning permission for part of the proposed urban extension has been approved (PA15/03787), for 138 dwellings. This has been included in the trajectory as delivering within 5 years. The allocation for 1000 is in addition to the permission and the site is recognised as a priority for the Council to support its delivery; although it is recognised that development of the land will not deliver any dwellings in the next year. A high level concept plan has been prepared by the Town Council and Cornwall Council , and was adopted in Autumn 2020. The Council is working with landowners including masterplanning. One landowner has signed an option agreement with a developer who is expected to submit an application shortly on part of the site. Work is underway on a Highway Infrastructure Fund bid which will take away significant upfront highway costs. This will speed up delivery of the site.	170
Kensey Valley (LAU-H3)	75	Part of the allocation site has a currently pending outline application for up to 100 dwellings	35
Withnoe Urban Extension (LAU-H1)	300	The land owner has instructed consultants to bring forward a scheme on their land and a national house builder is also on board to take forward a scheme for the majority of the allocation. Furthermore, discussions have taken place between a developer and the Council on the remaining parcels of land. The Council has also undertaken design work regarding the alignment and junction scheme for the road that will run through the site. Two applications are currently pending for the entire Withnoe site, one being from a national housebuilder, the other a local promoter. Consultants instructed to undertaken wider masterplanning for southern growth area, which includes this site; which will speed up the process for future RMs. The Council and Launceston Town Council consulted on a Masterplan for the southern growth area which was adopted in Autumn 2020.	122
Trevenson & Kosti Veur: Nansledan (NQ-H2)	1170	Part of site now has planning consent PA19/00646 for 143 dwellings	32
Riel: Nansledan (NQ-H1)	420	Part of wider Nansledan site, which is under construction. A Local Development Order for Nansledan is currently being worked on. Hybrid application for 265 (PA19/07079 Morrish Builders) approved	14

Hendra - Nansledan (NQ-M2)	375	Part of wider Nansledan site, which is under construction. A Local Development Order for Nansledan has been adopted	34
Edgcumbe (STA-M2)	25	This is Council owned land. CC is looking at possible future uses for the site	25
Long Rock (PZ-H1)	150	Current Application PA19/06270. Resolution to grant consent subject to the completion of the Section 106 Agreement which is being finalised.	105
Trannack (PZ-H4)	290	The site is identified within the Allocations DPD, as a housing site for up to 290 dwellings. It is in single ownership and the owner is in discussion with a developer about progressing a scheme. Some masterplanning work has been undertaken. The site is seen as a priority for the Council to work in partnership with the landowner/developer to support its delivery. The site has been looked at by several parties including Treveth and Affordable Housing, who have discounted it based on the landowners aspirations on value. Architects have been looking at layouts and topography and the split levels in particular, to try to achieve an acceptable quantum of development and also potentially marketing the site or seeking a 'Partner' to develop. Current negotiations taking place with a major national housebuilder with regard to a purchase subject to planning approval land deal.	87
Jennings Street (PZ-H14)	80	PZ-H14. I have made contact with both C Property & CC Legal to seek a steer on available resources to put together the 'team' that can progress a purchase strategy for Backlands. If internal resource is not available, this will require use of the framework or an open market commission. This action is on-going but a critical next step in delivery. Property currently in negotiation with landowners to pursue scheme using FHSF	21
Heamoor (PZ-H8)	350	Negotiations on-going with both potential purchasers (due to Council ownership of access) and the three other landowners to ensure a conjoined development/purchase of the site as a whole.	70
Coinage Hall (PZ-M2)	10	Now forms part of High Street Bid. Current negotiations with Treveth for purchase re development including St Anthony Gardens.	10

- 3.23 Table 9 brings together the different sources of supply that are considered deliverable within five years. It shows that of the total available capacity of 35,594 homes, 18,596 are considered capable of being delivered within five years.

**Table 9: Housing Supply**

Source	Total Capacity	Capacity deliverable within 5 years
Small sites <10 units with planning permission	6,130	5,428
Large sites of 10 or more units with planning permission	21,200	11,782
Sites awaiting the signing of a S106 agreement	150	50
Local Plan Site Allocations*	8,114	1,336
<b>Total available supply</b>	<b>35,594</b>	<b>18,596</b>

\* Only site allocations expected to deliver housing within 5 years are included towards totals

## 4 Conclusion

- 4.1 The NPPF requires local planning authorities to identify a 5 year supply of deliverable housing sites against its housing requirements. Revisions to the NPPF and PPG have provided greater certainty through the Housing Delivery Test that Cornwall is delivering homes above the required rate for this test. Additionally, changes to the definition of deliverability have meant evidence has had to be provided for major sites with outline permission and Local Plan Allocations. This has resulted in some sites being excluded on this basis, however despite this Table 10 below demonstrates that when assessed against the 5 year requirement, the deliverable supply of 18,596 represents a 6.7 years supply.

**Table 10: 5 Year Supply Position**

<b>Plan Requirement</b>	<b>52,500 (2,625 pa)</b>
5 Year requirement (2,625 x 5)	13,125
Plus any additional shortfall	N/A
5 year requirement plus 5% buffer	13,781
Total Supply capable of being delivered within 5 years	18,596
Supply as a percentage of 5 Year Requirement	134.9%
Years Supply	<b>6.7</b>

- 4.2 Since the adoption of the Local Plan numerous appeal decisions have been received where the inspector has agreed that the Council can now demonstrate a 5 year supply and the methodology used to determine the 5 year supply has been fully endorsed.
- 4.3 Most notably, the Secretary of State at his decision into the recovered appeal at Gonwin Farm, Carbis Bay (APP/D0840/W/153002925) in dismissing the appeal confirmed at paragraph 19 of his decision letter that there has not been a persistent record of under delivery, and that therefore a 5% buffer is applicable. He further confirmed that the Councils assessment of

delivery using average lead in times and delivery rates after applying a 10% discount for small sites, and applying a reduction for stalled sites and sites not expected to deliver within five years, was appropriate (paragraphs 20-23). He confirmed it was reasonable to assume delivery from sites approved in principle but that were awaiting the signing of a S106 agreement (paragraph 24), and from CLI sites (paragraph 25) and from those site allocations proceeding in advance of the Local Plan (paragraph 27).

- 4.4 The Council now has a surplus of 386 homes against the Local Plan requirement to date. However, Cornwall Council recognises that it is important to continue to ensure that there are sufficient homes that are available to ensure that build rates continue at the current levels. Cornwall Council can play its part in this process by continuing to grant permission for additional homes and is reliant to a large part on the housebuilding industry to build these homes. However, through the Cornwall Housing Development Programme the Council is being proactive by developing its own homebuilding programme to deliver quality homes, and the Council is looking at the potential to forward fund infrastructure that together will ensure building rates will continue at around 3,000 homes per year on average over the next five years.