



Cornwall Monitoring Report

Cornwall 5 Year Housing Land Supply Statement

1st July 2020

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IMPORTANT NOTE: THE IMPACT OF THE CORONA VIRUS

It is undeniable that the advent of COVID-19 is likely to have considerable consequences for the planning and housing sector. The extent and scale of the impact of the pandemic is at present an unknown, and the full impact of the crisis may not be understood for years to come.

It is not yet known or indeed calculable at this stage how long the crisis will continue and what the medium to long term impacts may be on the housing market. What is clear is that there are a number of factors likely to have a negative influence on both the ability of local authorities to continue to permission homes, and on housebuilders to continue to deliver them at expected rates.

These include but are in no way limited to:

- The wider impact of the crisis on the economy and the workforce
- The continued availability of materials and the reliability of supply
- The ability of SMEs and developers to remain solvent, and the knock-on implications of what continues to represent an attractive development opportunity financially
- The wider housing market and the demand for new housing
- The impact of lockdown and social distancing measures on related trades, and the resilience of the self employed sector
- The ability of companies to adapt to government measures and continue to deliver when traditional means to do us are no longer tenable.
- The ability to maintain transport links and manage logistics at a time where transportation may be restricted.
- The value of the pound in global markets (note that at time of writing the government is still negotiating Brexit).

At the time of writing (May 2020), the MHCLG have not released any new guidance in relation to the traditional measures of housing delivery such as 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 to establish a Five Year Supply; 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. For the 5YHLS, we must make sensible adaptations to our methodology to try and quantify the impact as best we can. With this in mind, Cornwall Council has amended it's 5 Year Supply methodology for 2020 in the following ways:

- 1) Traditionally, delivery projections are based on average lead-in times and delivery rates, which may then be amended should further qualitative information become available on a site. While this remains the case, a further 6 months has been added to projections to account for the likely dip in delivery in 2020-21.
- 2) Where sites already delivering homes would ordinarily be assumed to be capable of delivering immediately (from April 2020 onwards), projections for these sites will also be delayed for 6 months, so that delivery is only assumed to start half way through the year.
- 3) For small sites of less than 10 homes, it is not possible to apply the same delayed delivery as suggested above. This is because the number of homes on small sites that are counted towards the 5 year supply is an *aggregated* figure, further discounted by 10% to account for

potential non-delivery and permissions that may expire. Typically, the yield from these homes would be summed, discounted by 10%, and the remaining homes apportioned over the next 5 years at an even rate to avoid any artificial spike in the figures in years 1 and 2. In light of the pandemic and to keep a consistent approach to its impact, this year we will also be halving expected delivery from small sites in year 1, and pushing the remaining homes to be delivered outside the 5 year supply to deliver in year 6. This then does not diminish the deliverability of the sites themselves, but creates a more realistic expectation for the challenges of 2020/21.

2020 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 31st March 2020 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 22nd 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 3,028 completions during the year 2019/20. Since the start of the plan period there have been 26,636 completions at an average of 2,664 per year. This represents an over provision of 386 homes over the plan period when compared to the proposed Local Plan housing requirement of 2,625 per year, or 26,250 over 10 years. This means that to date the plan requirement has been met. The small shortfall of 17 homes identified last year has been more than compensated for through completions in 19/20, and therefore this year there is no shortfall to add to 5 year requirement (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 27,933 in 2020.

Table 1: Completions 2010-2019

Year	Completions	Number of Homes with Planning Permission
1 st April 2010 – Start of the Plan period	-	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

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 November 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 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

HOUSING DELIVERY TEST 2020 (provisional indicative figures only)				
Year	Source	Yrs for Avg	Calc. Need	Comps
2017-18	2014-based (Table 406)	2017-2027	2,193	3,405
2018-19	Minimum Annual Local Housing Need Figure*		2,625	3,136
2019-20	Minimum Annual Local Housing Need Figure*		2,625	3,028
Total for 2018-2019 test			7,443	9,569
Housing Delivery Test Percentage			129%	

- 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 129% 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 (26,250 – 26,636)*	N/A (386 surplus)
5 year requirement plus 5% buffer	13,781
5 Year requirement	13,781

* 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 19/20

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 31st March 2020 there was planning permission for 27,933 homes. As shown in Table 1 above, this supply has increased once again from 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 – 4,820)

- 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 10 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 Additionally for 19/20, a further reduction to deliverable supply for small sites has been applied to account for the detrimental effects of COVID 19. Whereas the Council's approach to small sites typically is to assume the discounted figure are deliverable within 5 years at a flat rate, for 19/20 proposed delivery in year one has been halved to represent the impact of the virus. The remaining delivery from small sites has been pushed outside the 5 year supply; presumed to deliver in year 6. As discussed in the introductory note, the exact impact on sites of the ongoing pandemic cannot be known, but the approach seems a reasonable approximation of potential disruption given the information we have to date.
- 3.9 As at 31st March 2020 there was planning permission for 5,966 homes on sites below 10 units. A 10% discount for non-delivery within five years has been applied to these permissions to give an estimated yield from this source of 5,369 dwellings over five years

using the traditional method. For 2019/20, this figure has been further discounted as outlined above by pushing half a year's anticipated yield from small sites outside of the 5 year supply, leaving a final figure anticipated from this source of 4,820 over 5 years.

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	Total
748	924	875	859	826	995	1,101	1,046	1,045	1,052	9,471

- 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 Appendix 2. 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. This will be continually reviewed and the assumptions revised as appropriate.
- 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 mainly relates to the Newquay Growth Area and large developments at Hayle and Truro. 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 It must be recognised that relying on average lead in times and delivery rates in 2019/20 while the COVID pandemic continues may not continue to provide a realistic measure of potential delivery. To account for this, all permissioned sites (including those already under construction) have this year had an additional 6 months added to calculated lead in times, effectively cutting projected delivery for active sites in half for year one and delaying the estimated commencement of others. This means that homes originally assessed as deliverable within 5 years have been pushed outside the 5 year supply for 2019/20.
- 3.16 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 4,438 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 1,457 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 Ref	ADDRESS	Evidence	Deduction in 5yr Supply
PA17/04068	Land At Tuckingmill /Church View Farm, Camborne	Various conditions have been discharged. Non material amendment to decision PA10/08655 to allow for different house types and facade treatment (layout and quantum remain the same) approved November 2019. However no evidence of activity since then and the DM officer opinion is that it is unlikely to come forward.	149
PA15/02623	Land At Tuckingmill/Church View Farm, Camborne	The DM officer is of the opinion the application is unlikely to come forward, as it is 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
PA15/01794	Land Off Tregenna Lane Camborne Cornwall	Reserved Matters refused December 2019. Appeal against refusal submitted. Delivery uncertain until outcome of the appeal known.	94
PA18/09717	Tolgarrick Road, Tuckingmill, Camborne	The permission is a Certificate of Lawfulness, to prove a material start to W2/PA09/00589/F However there is no evidence of progress or likelihood of development commencing	14
PA14/09582	South Crofty Mine, Dudnace Lane, Pool, Redruth	There is a reserved matters application for the site pending PA20/03089 . However the case officer has stated "There are currently a number of concerns in relation to land ownership, access and viability."	99

W2/PA08/01877/FM	Former Charles Andrew Clinic, West End, Redruth	There is no evidence of any likely progress on the remaining proposed 37 units.	37
W1/98/P/0493	Loggans Mill, Carwin Rise/Loggans Road, Hayle	No activity for some time. current pending application PA18/05585 by Coastline for Refurbishment and conversion of Loggans Mill building into 16 apartments, including internal and external alterations with associated parking.	8
W1/07/P/0075	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
W1/90/P/0668	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
W1/66/P/217630	The Coombe, Newlyn	Residual outline. No current activity. Request for TPO not granted in 2016	21
PA11/02991	W Harvey & Sons The Coombe Newlyn, Penzance TR18 5HF	Though a material start has been confirmed, there is no current activity or reason to consider that this development is likely to be completed within 5 years	14
PA17/04940	Land At Keveral Gardens, Seaton	There is no current or recent activity on this site	10
PA17/02521	The Showroom, Duchy Motors, Grenville Road, Lostwithiel	There has been no recent activity on this site	10
PA15/07114	Penhale Camp, Camp Road, Holywell Bay, Newquay, TR8 5PF	Currently stalled due to significant offsite infrastructure costs.	134
PA16/04955	Land North Of Mountlea Drive, Mountside Road, Par	There has been no recent activity on this site that would provide evidence of deliverability	103
E2/09/00575/FUL	Land Pt Os 4966 East Taphouse	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 at present this is assumed a stalled site.	28

PA17/03432	Land South Of Annears Garage, Tywardreath Highway, Par	No activity to suggest the site is progressing.	10
PA14/10875	Carlyon Bay St Austell PL25 3RG	No activity to suggest the site is progressing.	283
PA16/03739	Trewhiddle Park Trewhiddle St Austell	There appears to have been no visible activity on the site since 2017	23
PA17/02914	Car Park, East Hill, St Austell	No evidence is currently available to suggest that this site is likely to come forward within 5 years	10
W1/89/P/1079	Carbis Bay Hotel, Beach Road, Carbis Bay, St Ives	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
PA15/02691	Carbis Bay Holiday Park(Site B), Laity Lane, Carbis Bay	No recent activity/ applications to suggest that development may be deliverable within 5 years	49
PA15/10302	Carbis Bay Holiday Park, Laity Lane, Carbis Bay	No recent activity/ applications to suggest that development may be deliverable within 5 years	34
PA17/01771	Police Station 4 Ferry Street, Torpoint	CC Cabinet approved the purchase of the site in April 2019 and CC now own the site and surrounding property to facilitate future redevelopment. The existing consent for demolition of the Police Station and re development as flats though will not proceed in its current form.	10
C1/PA03/2340/06/M	The Former Site Of Tregolls House Tregolls Road Truro TR1 1PX	No recent activity/ applications to suggest that development may be deliverable within 5 years	14
PA16/04611	Land At Bradfords Quay, Bradfords Quay, Wadebridge	83 dwellings constructed under E1/2009/01772. There appears to be no activity regarding the remaining 12.	12
PA17/01918	Land At Keston South Of West Hill, West Hill, Wadebridge	This application expires in may 2020. There have no recent pre apps or a reserved matters to suggest progression.	75
		Total Deduction from 5 Year Supply	1,457

- 3.17 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	5,966	4,820
Large Sites (10+) with permission	21,967	11,676
	27,933	16,496

- 3.18 This process has resulted in the total yield from planning permissions on sites of 10 or more being effectively 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.
- 3.19 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.
- 3.20 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 27,933 to 16,486 represents a significant reduction for non-delivery within five years.

Other Sources

- 3.21 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 – 197)

- 3.22 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 Appendix 2, including the additional 6 month delay to account for C19. 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 1st April 2020', and their inclusion is then borne out by the subsequent signing of the agreement and issuing of the decision.

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

Site	Total Capacity	Yield in 5 years	Justification / Evidence
Land East Of Greenbank, Greenbank, Connor Downs, TR27 5DA (PA19/00988)	30	30	Outline planning permission approved at Committee in January 2019, subject to completion of a s106.
Land Off East Hill, Blackwater TR4 8EG (PA19/02224)	28	28	Full planning permission approved at Committee 16/3/20, subject to a s106.
Land North Of Wadebridge Football Ground, Gonvena Hill, Wadebridge (PA17/03835)	143	87	Full planning permission granted at Committee on 16/3/20, approved subject to s106.
Land South Of St Mewan Lane, St Mewan Lane, Trewoon, Cornwall, PL25 5SP (PA19/06196)	19	19	Full planning permission granted subject to s106.
Land North Of Parkengear Veau/Carne View, Probus (PA19/09344)	55	5	Outline consent granted at Committee on 17/2/20 approved subject to s106
Treglos Hotel, Access To Constantine Bay, Constantine Bay, Padstow, PL28 8JH (PA19/05595)	28	28	Planning Committee resolved on 2nd March 2020 to grant full conditional planning permission, subject to completion of a S106. The agreement is in the process of being drafted.

ii) Cornwall Land Initiative Sites (40 dwellings)

- 3.23 There is one Cornwall Land Initiative site predicted to bring forward a total of 40 units at Trevenner Road in West Penwith. The purchase for this land is now complete and the site is fully in Cornwall Council ownership. Planning consent was achieved 3rd June 2019. Pre-COVID-19 it was expected that the site would fully complete by October 2020. Even with delay, it still seems reasonable that it would complete if not within the financial year, within the next five.

iii) Sites proposed in the Site Allocations DPD (1135 dwellings)

- 3.24 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	Total Capacity	5yr Yield	Justification
Halgavor Urban Extension west and east, Bodmin (Bd-UE2a), (Bd-UE2b)	770	104	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.
St Lawrences urban extension (Bd-UE3)	709	76	Full site capacity 780. 709 unpermitted. Pending outline application (PA19/07457) on a part of the site for approximately 90 units
Castle Street, Bodmin BD-M1	150	100	Current PPA and EIA Screening Opinion pending for residential Development (Bunny Homes) for c170 dwellings
Westheath, Bodmin	45	45	Outline planning application pending (approved after April 2020) for up to 45 dwellings
Tolgus Urban Extension (CPIR-UE1)	280	70	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
Falmouth North (FP-H2)	300	87	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 and a decision is expected by the end of the year. Delegated Approval subject to the completion of the Section 106 Agreement which is in negotiation with the Councils Legal Department.

Trevassack, Hayle(H-UE1)	1000	175	<p>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 will be adopted by the 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.</p>
Withnoe Urban Extension, Launceston (LAU-1)	300	87	<p>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 undertake 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 are consulting on a Masterplan for the southern growth area, due to be adopted by Autumn 2020.</p>
Trevenson & Kosti Veur: Nansledan (NQ-H2)	1170	52	<p>Part of site now has planning consent PA19/00646 for 143 dwellings</p>

Trannack, Penzance (PZ-H4)	290	87	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.
Falmouth Road (FP-H4)	210	17	Owners currently in Legals with a third party with the intention to exchange for a mixed use scheme.
Kergilliack (Phase 2) (FP-H3)	96	17	Part of site is under construction (see pp) Pending detailed application for 138 dwellings PA19/10381 by national housebuilders Barratt David Wilson Homes. Pre apps submitted in 2019
Callywith Urban Village (Bd-UE4)	650	17	Seen as strategic site for delivery; the off site highway works to provide capacity for the development already in place. Council to work with landowners to bring forward a scheme
Newquay Growth Area Rialton (NQ-H1)	420	17	Part of wider Nansledan site, which is under construction. A Local Development Order for Nansledan is currently being worked on. Pending hybrid application for 265 (PA19/07079 Morrish Builders)
Station Quarter (NQ-M1)	150	17	CC involvement/ early stage masterplanning and consultation with partners. Network Rail investigating additional platform/ facilities requirement - likely to be another year until their response.
Hendra - Nansledan (NQ-M2)	375	17	Part of wider Nansledan site, which is under construction. A Local Development Order for Nansledan is currently being worked on.
Long Rock (PZ-H1)	150	70	Current Application PA19/06270. Resolution to grant consent subject to the completion of the Section 106 Agreement which is being finalised.
Jennings Street	80	35	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.

Heamoor (PZ-H8)	350	35	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.
Coinage Hall	10	10	Now forms part of High Street Bid. Discussions on-going with 3rd parties interested in Coinage Hall, including a existing local hotel developer and Newlyn School of Art. We have also spoken to a Group of Bristol based Investors connected to the current occupier of the PZ Gallery. They are currently preparing a Business Plan and Proposal to purchase the site and then either develop or dispose with planning consent for a mixed use Hotel and Creative workspace development. These are in very early stages and feasibility is not known. However, it is positive to know that there is external interest in CH – including Treveth.

3.25 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 35,781 homes, 18,104 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	5,966	4,820
Large sites of 10 or more units with planning permission	21,967	11,676
Sites awaiting the signing of a S106 agreement	303	197
Cornwall Land Initiative Sites	40	40
Local Plan Site Allocations*	7,505	1,135
Total available supply	35,781	17,868

* 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 17,868 represents a 6.5 years supply.

Table 10: 5 Year Supply Position

Plan Requirement	52,500 (2,625 pa)
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	17,868
Supply as a percentage of 5 Year Requirement	129.7%
Years Supply	6.5

- 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 Council's 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 small shortfall in meeting the Local Plan requirement identified last year (17 homes) has been eradicated this year, to the extent that the Council now has a surplus of 386 homes on this measure. 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.