

Maldon District Council

Five Year Housing Land Supply Statement 2024/25

Up to 31st March 2025

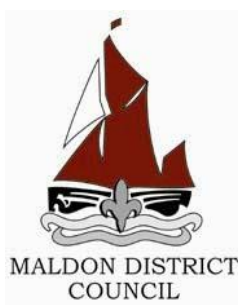


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Executive Summary

- (i) In accordance with National Planning Policy Framework (NPPF December 2024) paragraph 78, the Council has set out that at the present time it **does not have** a five-year deliverable land supply of housing against the District's housing requirements.
- (ii) The Council's latest housing requirements are set out using the National Standard Method as set out in National Planning Practice Guidance and using the National Standard Method. This has set the District's Housing Need at **575** dwellings per year.
- (iii) The base-line housing requirement for housing over the 5-year period of the 5 Year Housing Land Supply (5YHLS) is the National Standard Method Housing Need figure (575) multiplied by 5. The Council is applying a 5% buffer onto that figure and including any shortfall from previous years as set out in Paragraph 013 of the National Planning Practice Guidance.

MALDON DISTRICT 5-YEAR HOUSING LAND SUPPLY REQUIREMENT	
Annual Housing Target 575 x 5 years	2,875
Plus Housing Shortfall	154
Plus 5% buffer	151.45
Total Housing Requirement (Y)	3,180
SUPPLY	
Housing on the Strategic Housing Allocations from the LDP	1,073
Housing from windfall planning permissions	591
Windfall allowance	137
Total Housing Supply (X)	1,801
X divided by Y x 5 years	
1,801/3180 x 5	2.83 years

- (iv) The Council can therefore demonstrate a 2.8 years' worth of housing land supply against its identified housing requirement.

1.0 Introduction

- 1.1 This statement sets out Maldon District Council's 5YHLS position and identifies specific sites which are considered to meet the criteria set out in the National Planning Policy Framework (NPPF) (MHCLG, 2024) that contribute to it.
- 1.2 This statement has been prepared in accordance with the NPPF and the National Planning Practice Guidance (NPPG).
- 1.3 The NPPF sets out the Government's housing objectives including a commitment to significantly boost the supply of housing.
- 1.4 The NPPF was updated in December 2024 and the requirements to update annually a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements have altered significantly, which are reflected in this report. Firstly, there has been the introduction of paragraph 78 as set out below.

NPPF para 78

...Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or
- c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework, and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance

- 1.5 Maldon District Council falls within (a) of paragraph 78 in that the Council has to provide a 5% buffer onto its 5YHLS to ensure choice and competition in the market for land.
- 1.6 For the purposes of the 5YHLS, Maldon District has not underdelivered on its housing delivery for the last three years as set out in Table 2 below.

1.7 For the purposes of the NPPF 2024, deliverable sites are defined within Annex 2 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. In particular:

- a) sites which do not involve major development and have planning permission, and all 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 (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

2.0 The Five-Year Period and Housing Requirement

- 2.1 This statement includes completions from the reporting year of 2024/25; planning approvals up to 31 March 2025, projected completions for a five-year period from 1 April 2025 to 31 March 2030 and a windfall allowance.

Base-line housing requirement

- 2.2 Maldon District Council's housing requirements are set out in the Approved Maldon District Local Development Plan (LDP) July 2017, this included at the time an up-to-date assessment of the District's objectively assessed housing needs (OAN). It was identified that the District's housing requirement for the period 2014 – 2029 (15 years) should be 310 new homes per annum, or 4,650 over the plan period. The LDP housing requirement figure of 310 dwellings per annum (dpa) was comparable to the 2019 minimum local housing need of 308 dpa, as calculated using the Government's then standard method.
- 2.3 In the National Guidance on Housing Supply and Delivery at Paragraph: Paragraph: 001 Reference ID: 68-001-20241212 it states that.

The standard method for calculating local housing need provides a minimum number of homes to be planned for. Authorities should use the standard method as the starting point when preparing the housing requirement in their plan, unless exceptional circumstances justify an alternative approach

2.4 The National Standard Method for Calculating Housing Need

1. The Government altered the Standard Method in December 2024. The standard method uses a formula that incorporates a baseline of local housing stock which is then adjusted upwards to reflect local affordability pressures to identify the minimum number of homes expected to be planned for.
2. The baseline for the Standard Method is 0.8% of the housing stock in an area.
3. **Affordability adjustment.** The above annual growth figure is then adjusted based on how affordable it is to buy a house in the area, by looking at the area's 'affordability ratio'. This figure is found on the most recent [median workplace-based affordability ratios](#), published by the Office for National Statistics at a local authority level.

If the average house price is more than five times the average annual earnings of someone who works in the area, then the figure is adjusted upwards – the more unaffordable the area, the bigger the need adjustment. For each 1% the ratio is above 5, the housing stock baseline should be increased by 0.95%.

For Maldon District in March 2025 the affordability ratio figure was 12.38. This is based on a five-year average as set out in the revised Standard Method.

4. A formula is then applied to the above figures. These figures input into the formula changes year on year as the affordability ratio changes and the housing stock changes.

The formula for 2024/25 is as follows.

Standard Method Calculation for 2025/26	
Stock up to 2023	29918
Stock x 0.8 %	239.344
2024 Median workplace-based affordability ratio from the ONS (they have used annualised weekly earning for MDC) average 5 years	12.38
For every 1% above 5 the affordability ratio is increased by 0.25% plus 1	2.4022
Total uplift Ratio	0
Total Housing Need	574.95
Rounded	575

5. The 5-year housing need figure for the District is therefore 575 homes x 5 = **2875**

2.5 Housing completions

2.6 Completions for the reporting year (in **Table 1**) have been calculated from the data provided in **Appendix A, as MSExcels spreadsheets**. For monitoring purposes, housing completions are recorded as complete where:

- a) Building Control have recorded the housing unit as complete; or
- b) it is recorded as being valid to pay Council Tax; or
- c) it has been confirmed via a site visit.

Table 1
Completed
dwelling

Category	Net Completions
Sites completed within the year	400

s total for reporting year 2024/25

Table 2 Calculation of completions since the start of the LDP period 2014/15 to 2024/25 and the shortfall in housing completions against the yearly target.

Year	Annual Requirement	Net Recorded Completions	Shortfall/Surplus for each year
2014/15	310	69	-241
2015/16	310	230	-80
2016/17	310	243	-67
2017/18	310	166	-144
2018/19	310	306	-4
2019/20	310	462	152
2020/21	310	426	116
2021/22	310	330	20
2022/23	310	449	139
2023/24	279	403	124
2024/25	569	400	-169
Total	3638	3484	-154

2.7 There is therefore a cumulative undersupply of **154** housing units since 2014/15.

2.8 NPPF Buffer

2.9 The NPPF requires that a buffer is added onto the baseline plus any shortfall in housing. For Maldon District Council this buffer is 5% because the Council has not underdelivered for the preceding 3 years.

3.0 The Supply of Deliverable Housing

3.1 The District's housing supply consists of the following components:

- Local Development Plan Strategic Sites with planning permission
- Windfall Sites with planning permission
- A windfall allowance

3.2 Developable and deliverable sites (or part of a site) with a reasonable expectation that development will occur in the next five years are included in the 5YHLS. The NPPF definition of deliverable is set out on page 5 of this document. With regard to this matter. The judge in an important Court of appeal decision: *Modwen Vs SOS (2014)* stated that *"the assessment of housing supply is concerned with deliverability, and does not require certainty that the housing sites will actually be developed within the 5 year period and as the Inspector recognised deliverability was not disproved by showing that there were uncertainties"*.

3.3 This court of appeal decision was based on the 2012 NPPF and there have been an number of updates since then and a number of updates to the National Planning Practice Guidance. But what it sets out is that it is not necessary to have absolute concrete evidence of deliverability of sites for them to be included in the 5-year supply.

Deliverable sites are:

- Available now;
- Suitable location for development;
- Achievable with a realistic prospect that housing will be delivered on the site within 5 years;
- Sites with planning permission for under 10 houses are deliverable until the permission expires;
- Sites with detailed planning permission are deliverable until the permission expires; and
- Sites with outline permission for under 10 houses are considered deliverable.

3.4 Where it can be evidenced that a site will not be developed within five years, or there is reasonable uncertainty regarding when the site will be developed, that site has been excluded from the housing supply for the 5YHLS calculation.

3.5 In regard to major development sites (sites over 10 units) with outline planning permission, the Council will include some of the granted housing units in the 5-year supply where the Council has been able to obtain and validate evidence that the site is developable within the 5-year period. This evidence will comprise some, or all of the following:

- Confirmation from the landowner or promoter that a developer is on board to deliver the site
- Written responses from the landowners/developers to ascertain when they intend to bring the site forward through Reserved Matters applications
- Evidence that the site has started to discharge its planning conditions.
- Evidence that the site is having active pre-application discussions with the Council or there is a Planning Performance Agreement (PPA) in place which is being worked on to enable Reserved Matters applications to be submitted.

3.6 If major outline sites are found to have a realistic prospect of delivery, then the Council will apply the average delivery build-out time for this type of site to the 5-year supply. The average delivery time for major sites in the District are as follows.

- Major Outline planning permissions for sites under 50 units take on average 5.6 years to reach first unit completion from the date of decision. There are only 5 of these types of sites, two of which have not started yet. It is not considered a representative trend sample to ascertain what the delivery lead-should be. Therefore, a judgement will have to be made to ascertain what is an appropriate start time in relation to these in the 5-year supply on a case-by-case basis.
- Major Outline planning permission for sites between 50 and 100 units take on average 4.5 years to reach first unit completion from the date of decision.
- Major Outline planning permission for site over 100 units take on average 4.1 years to reach first unit completion from the date of decision.

3.7 The Lichfield 'Start to Finish' Third Edition - post 2024 election and NPPF Consultation 2024 has shown that major sites with a grant of outline permission take on average between 3 and 4.6 years to deliver their first site – this is comparable to the District's delivery time for sites over 50 units. These figures will be kept under constant review and revised each year, the evidence for the above is set out at Appendix B in an MSExcel Spreadsheet.

3.8 Sites not included in the 5YHLS

3.9 Where development is unlikely to come forward on sites with extant planning permission, the site is discounted from the 5YHLS. These sites are either no longer available for development or have various long-term issues preventing development or making it challenging to bring them forward in reasonable time. If circumstances change, for example work recommences on site, or a new planning permission is granted, the site would be placed back into the 5YHLS schedule subject to the same deliverable and developable tests above.

3.10 Windfall

3.11 The Council has included a windfall allowance in the 5YHLS. This is because the present Local Development Plan was approved in July 2017 and therefore the strategic site allocations in it are now either built, or being built out. Therefore, ahead of an updated Local Development Plan, sites coming forward will inevitably be windfall development.

3.12 Since 2016 the number of minor housing units (sites under 10 units) being delivered through windfall has totalled 495. This is an average of 55 units per year. As can be seen from the table below the last two years has increased for the reasons set out above and it is expected that this will increase further due to the tilted balance implications in the NPPF and ahead of an updated Local Development Plan.

Year	Number of units granted Planning Permission
2016	23
2017	31
2018	66
2019	47
2020	51
2021	65
2022	44
2023	85
2024	83
Total	495
Average	55

3.13 The windfall that is put into the 5YHLS from 2025 will not, however, start to come forward straightaway. Analysis of delivery rates across minor windfall development shows that it is taking on average 2.5 years for the first unit completion on site. Therefore, it is proposed that 27 units of windfall housing should be put into the 5YHLS from year 3 and 55 units of windfall housing should be put in for years 4 and 5. This will be a total of 137 units. The delivery of windfall will be monitored yearly, and adjustments made in future years as necessary. The evidence is set out at Appendix C in a MSEXcel spreadsheet.

3.14 Slippage and Non-Implementation rate

3.15 Expired planning permissions are excluded from the 5YHLS. The Council is not obliged to deduct a slippage rate in its 5YHLS supply calculations. Planning permissions which have expired are greyed out in the **Appendix A** in an MSEXcel spreadsheet which accompanies this Statement.

3.16 The total number of expiries for the District is very low. There have been nil expiries with regard to the Strategic Site Allocations. With regard to the windfall sites, the total net capacity of all the windfall sites set out in **Appendix A** is 2,421 units. The total number of expired units for same period to the 31 March 2025 is 70. This is 2.89%. Given the fact that the District has passed the Housing Delivery Test (HDT) with 142% as published in December 2024, it is considered reasonable that a slippage rate under 5% at the present time does not warrant being included in the 5YHLS.

4.0 Calculating the Rolling Five Year Housing Requirement

4.1 The District's requirement for a 5YHLS is as follows:

MALDON DISTRICT 5-YEAR HOUSING LAND SUPPLY	
REQUIREMENT	
Annual Housing Target 575 x 5 years	2,875
Plus Housing Shortfall	154
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Total Housing Supply (X)	1,801
X divided by Y x 5 years	
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5.0 Conclusion

- 5.1 This statement provides evidence that the Council can demonstrate a supply of specific deliverable sites sufficient to provide for 2.8 years' worth of housing against the Council's identified housing requirements. The details of all the sites are set out in **Appendix A** that accompanies this paper.
- 5.2 The 5-year supply has substantially fallen because of the Governments Standard Method changes published in December 2024.
- 5.3 The Council will continue to monitor the District's housing supply on a regular basis. This statement will be updated yearly.