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# **Residential Land Supply: Contested Policy Failure in Declining Land Availability for Housing**

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# **Residential Land Supply: Contested Policy Failure in Declining Land Availability for Housing**

*Planning plays a key role in ensuring the provision of adequate residential land exists for housing development. This paper explores the failure of housing land supply policy in Wales from multiple policy failure perspectives, ultimately identifying three key findings. Firstly, the goal-orientated failure in achieving five-year housing land supply is evident. Secondly the reasons for failure vary but focus on the ramifications of the calculations and also relationships of planners and housebuilders across the public and private sector. Finally, despite the explanations cited for failure, the need for five-year land supply calculations to facilitate housing provision remains an unquestioned necessity.*

Keywords: housing; land supply; policy failure; Wales; planning

## **Introduction**

The management of private sector housing land supply forms a key function of the planning system in many countries. Common arguments for residential land supply management include pressure to control growth in desirable areas (Monk et al., 2013), contain urban sprawl (Buxton and Taylor, 2009), direct housing to brownfield sites (Ganser and Williams, 2007), and guarantee enough land is provided within the system to manage house price volatility (Tse, R., 1998; Hannah, Kim, and Mills, 1993). Recent global trends have seen a neo-liberal shift in planning in many countries as pressure to ease planning restrictions to increase the supply of housing has aided the ‘financialisation of land and housing markets’ (Bradley, 2020, p2). As a result, the impact of housing land supply policies on the market, as either a constraining factor or as a means to manage negative externalities, remains a broader concern internationally with Gurran and Phibbs (2013, p384) arguing there continues to be a “need to consider contextual differences in housing markets and land use regulation, both in examining relationships between planning and housing, and in transferring findings”. How private sector housebuilders react to land supply policies in different contexts is also of growing interest with findings from the United States and the UK pointing to similar housebuilder behaviour during

high housing demand periods despite having quite different regulatory planning regimes (Adams et al., 2009; Guthrie, 2010). Notwithstanding geographical and regulatory differences concerns of housing supply in other countries, such as Canada, Australia, and New Zealand where housebuilding in and around major cities is not able to keep up with demand thereby leading to rapidly increasing house prices, is also noticeable with stringent planning rules and burdensome regulations often blamed for the inability to keep up with demand (Tencer, 2016; Beer et al., 2006; Monk et al., 2013; Gordon, 2020). The divergent ways in which different planning policies and approaches addresses residential land supply in market economies under the context of an increasingly deregulated system is therefore of growing interest as is the general failure to do so effectively.

Similar to the previously noted international examples, the UK relies on tools relating to housing supply to deliver residential development through the planning system (Barker, 2004). Since the introduction of the 1947 Town and Country Planning Act, planning for housing in the United Kingdom has been a 'key responsibility of local planning authorities' (Hull, 1997, p368). The provision of a five-year housing land supply in the UK dates back to supplementary guidance in 1981 which 'introduced the requirement for a five-year land supply and for housing land availability studies' to be 'undertaken jointly by [Local Planning Authorities] and the housebuilding industry' (Adams, 2009, p954). In the event of a five-year land supply not being achieved further guidance introduced the idea of planning applications for housing being determined favourably except for in cases where clear planning objections were present.

The shortfall of housing sites in England is often attributed to the use of an inconsistent methodology to calculate the five-year housing land supply (Emmett, 2015). In sharp contrast, until recently Wales benefited from clear guidance to calculate five-year land supply. From 2006, all Welsh Local Planning Authorities (LPAs) utilised a consistent methodology enabling a 'like-for-like comparison' between LPAs (Emmett, 2015, p8). Guidelines produced by the

Welsh Government in 2015 offered direction on calculating a five-year land supply. All LPAs in Wales were required to undertake land assessments to prove that ‘sufficient land is available or will become available, for a five-year supply of housing land’ (Welsh Government, 2019). Despite the consistent methodology Welsh LPAs continued to experience a significant supply shortfall (HBF 2016; Lichfields, 2018), much like their English neighbours, with housing land supplies declining dramatically in Wales. In 2017, only 4 out of 25 authorities maintained a five-year land supply, with emerging trends showing ‘little improvement’ (Early, 2017, p12).

Research on housing land supply in the UK mainly focuses on the English approach. Previous studies have usefully explored the role of economic events (Payne, 2015), planning policy (Adams, 2009; Hull, 1997), and the relationship between stakeholders (Nicol, 2002). Additional research (Baxter, 2011; HBF, 2016; Early, 2017) has also begun to recognise how different factors causing land supply shortfalls are inextricably linked, highlighting the need to reflect on these issues from multiple perspectives. At present, the need to investigate five-year land supply, and its failures, is increasingly pressing in light of the current economic climate and divergent approaches from traditional five-year housing land supply calculations in England and Wales. Firstly, the impacts of the coronavirus pandemic, and resulting recession in the UK, may hinder the delivery of new homes for a period of up to 5 years causing sites to stall in the development process (Booth, 2020). Secondly, the Planning White Paper (Building for the Future) proposes a ‘standard method for establishing housing requirements’ (Ministry of Housing, Communities and Local Government, 2020, p33) in England whereas in Wales, the calculation of a five-year residential land supply has been removed following the revocation of planning guidance known as Technical Advice Note (TAN) 1 in March 2020 (James, 2020) with planning authorities having to utilise ‘housing trajectories’ to monitor housing delivery instead. In this way, exploring the reasons for the failure of LPAs in Wales to consistently achieve a five-year land supply is key in light of the national requirement to deliver 300,000 new homes in the UK (Ministry of Housing, Communities and Local Government, 2020).

The following seeks to unpack the failure of the five-year housing land supply policy approach in Wales. The research follows a particular period in Wales at which a standard and consistent methodology informed five-year land supply calculations for all LPAs, only for the weighting placed on this approach in planning decisions to then be disapplied by the Government as a temporary measure in 2018 – which subsequent to the end of the research upon which this article is based was made permanent through the revocation of guidance on the subject by Welsh Government in March 2020. We examine the failure of the policy from two perspectives, as a goal-oriented failure of LPAs to consistently achieve a five-year land supply as well as from a stakeholder assessed failure by local planner officers, housebuilders, and planning consultants. In doing so, we argue first that the effectiveness of public policy should be assessed through multiple perspectives beyond a singular target, second that the importance of maintaining a five-year land supply as an over-arching planning objective is broadly supported by stakeholders in Wales, and third that the approach to achieving that goal is disputed and the apportionment of blame for not achieving it varies depending on stakeholder perceptions. The research also has wider implications beyond Wales in planning for housing and the effective development and implementation of residential land supply policy. We begin first by briefly exploring the public policy literature on policy failure, followed by a discussion on housing land supply and planning policy with particular reference to the UK. The research approach is then outlined before moving on to an analysis of Wales' five-year land supply policy from a goal-orientated as well as stakeholder-oriented perspective before concluding with a discussion of the wider implications of the research.

### **Assessing Policy Failure**

Policy failure is an oft examined issue in academia as well as broader public discourse but one which is typically poorly defined. It is argued that most studies lack appropriate conceptualisation by not explicitly defining policy failure, assuming policy failure is self-evident, or by failing to recognise the complexity of policy failure (McConnell, 2015). Case

studies typically articulate either rationalist approaches which seek to quantify a goal and measure its achievement (Argyrous, 2009; Gupta, 2001) or post-positivist approaches that argue for the importance of perception in defining failure (Taylor and Balloch, 2005; Bovens and ‘t Hart, 1996). This highlights the variable ways in which failure in public policy can be defined as well as the complex relationship between goal setting and perceived effectiveness. As a result, McConnell (2015, p230) constructs a definition of policy failure that encompasses both by arguing that:

A policy fails, even if it is successful in some minimal respects, if it does not fundamentally achieve the goals that proponents set out to achieve, and opposition is great and/or support is virtually non-existent.

From this definition of policy failure, we can identify the important role that the proponents, in terms of goal setting, as well as stakeholders, in terms of acceptance, play in assessing policy failure. This also sets out the assumption that policy can potentially both succeed and fail. McConnell (2015) goes on to define some of the potential methodological issues with studying policy failure, including the need to acknowledge different perceptions, differing benchmarks, grey areas where policy might be succeeding but not necessarily achieving the exact target set, the potential negative impact of policy failure on certain groups more than others, and need to be aware that *when* a policy is evaluated may change the outcome of the assessment.

There are therefore multiple factors that need to be considered as well as approaches to be taken when evaluating policy. Vedung (2013) outlines six core models for evaluating a policy: the goal-attainment model; the side-effects model; the relevance model; the collegial models; the client-orientated model; and the stakeholder model. The goal-attainment model seeks to make a linkage between the programme/policy’s objective(s) and the results attained in practice, determining success or failure based on the achievement of the stated goal. This model however fails to account for the side-effects, both positive and negative, of the programme in determining success. Unlike the goal-attainment model, the side-effects model seeks to account

for this and expand the criteria to also search for impacts beyond the specific goal set. Determining the value of an intervention beyond a set goal is further associated with the relevance model which seeks to consider whether the programme/policy addresses the underlying problem that the set objective(s) are trying to solve, though this approach suffers from the complexity of this task.

Alternatives to these merit criteria models are what Vedung (2013) refers to as the actor models. One of these, the collegial model, draws on peer review and/or self-evaluation approaches to assess the success or failure of a policy. This is in contrast to the client-orientated model which focuses on those who are the target of the intervention to undertake the evaluation based on their individual criteria which in turn can help to legitimise the programme/policy. Like this model, the stakeholder model allows those involved to set their own evaluation criteria but is broader in terms of identifying the actors to be included in the discussion. Stakeholders tend to be those that are involved, have an interest in, or benefit from an intervention. The method often relies on a more qualitative approach through which the evaluator 'might discover both the purported and the genuine aims of the intervention, and what concerns various stakeholders nurture regarding it' (Vedung, 2013, p395).

Vedung concludes by arguing that the different models offer only partial views and solutions and therefore recommends combinations of several models when undertaking a policy evaluation. With this in mind, this study draws on a combination of the goal-attainment model as well as stakeholder model in order to explore housing land supply policy failure in Wales. This approach is useful as housing land supply policy has a very clearly defined goal but includes a range of stakeholders necessary to achieve it. Before turning to an evaluation of housing land supply policy, however, we first provide a discussion and contextualisation in relation to planning practice in the UK.

## **Housing Land Supply and Planning**



There has been a long-term acknowledgement of the UK Government's inability to ensure the demand for residential land is met and ensure enough land is coming forward to deliver the required number of houses needed (Gallent et al., 2017; Hull, 1997; Cullingworth, 1997). Much has been made of the role of planning acting as a constraint that actively limits the 'choice available to consumers' (Monk et al, 1994, p509) with the inadequacies of the planning system hindering the delivery of housing (Cullingworth, 1997). While the 1947 Town and Country Planning Act set intentions for the planning system to deliver land for housing, construction of new housing has been 'decreasing steadily since the 1970s' (Hilber, 2015, p4).

From a historical perspective, Bramley (2005) describes how, between 1945–1975, housing policy concentrated on promoting increased supply to address post-war shortages leading to a peak in delivery in the mid-1960s (Cochrane et al, 2015). After 1975, following a perception that those shortages were overcome, housing policy appeared to 'retreat from the front rank of policy sectors' (Bramley, 2005, p222). In the 1980s, the delivery of housing began to shift towards market-based forms of delivery with the expertise to assess housing need residing exclusively with housebuilders (Bramley, 2006; Rydin, 1998). Following these ideological shifts, Bramley (2005) considered how the 2003 sustainable communities plan, a major UK government policy to guide key spatial planning and regeneration efforts, and the 2003/4 reports of the Barker inquiry on housing supply for the UK government made the link between planning policy and housing delivery. These publications highlighted the variegated nature of regional markets and issues of delivery and affordability. In this way, housing supply was 'rediscovered' (Bramley, 2005, p221) as a major policy issue with the attention of policy makers shifting towards the tools available to planners to regulate housing demand and their associated methods. Linked to this, it is important to consider that housing provision can also be a political issue (Broughton and Keohane, 2013). This is in terms of 'local resistance to new development' (Burgess et al, 2010, p5), 'resistance to national and regional targets' (Burgess et al, 2010, p4) or, on the contrary, elected members promising more houses in areas struggling with delivery to win voters' trust (Burgess et al., 2010).

Rydin (2008) and Hull (1997) have previously identified the link between the bureaucracy of planning systems and residential land supply. Their research particularly focused on Joint Housing Land Availability Study (JHLAS) in England with Rydin (2008) providing a critical assessment of these studies as procedural tools available to planners. She recommended caution when utilising the seemingly objective figures that arise from these studies to justify interventions. This sentiment is echoed to an extent by research in Wales which considers how JHLASs are based on household projections and, therefore, subject to considerable uncertainty due to the fact that these calculated projections represent a past trend projected into the future (Harris et al, 2018). Significant uncertainty therefore remains with regards to quantitative tools available to planners to monitor and deliver residential land. Population projections and household growth act as a starting point for the calculation of residential land supply yet while these appear to possess a form of objectivity, they are simply a past trend projected into the future, and as such are vulnerable to economic change and market fluctuations (Hull, 1996). Projections remain a critical policy tool yet shortfalls linked to the methodology can cause discrepancies between how much land is perceived to be needed for residential development and how much is actually utilised (Harris et al., 2018).

Housing shortfalls are described as ‘ingrained’ within the planning system which leads to a ‘lack of certainty as to whether enough land is being allocated to housing’ (Emmett, 2015, p3) through policy allocations. The planning system has aimed to address its unresponsiveness to the market by welcoming stakeholders such as the House Builders Federation (HBF), the trade association representing private sector homebuilders in England and Wales, to ‘play a greater role in assessing housing demand’ during the preliminary stages of policy allocations (Hull, 1997, p369). However, links between the rigidity of the system and housing land shortfalls continue to be made. Hilber (2015) attributes the decline in supply to regulatory processes resulting from a history of urban containment policies and the potential of the local development control process to politicise housing decisions, while research commissioned by the HBF (2016) highlights the policy burdens on housebuilders. These consist of planning

delays, site specific constraints which are not recognised by LPAs and ambitious demands made on developer community contributions, affecting supply as housing sites are less likely to be brought forward for development due to them no longer being profitable. These sites then remain stagnant in the process affecting five-year land supply figures. Welsh Government (2015) attributes the fall in housing supply to local authorities actively allocating undeliverable sites which are unlikely to come forward during the Local Development Plan (LDP) period causing five-year land supply to decrease.

Economic factors also play a role in housing land supply and delivery. The limitations imposed by viability (Willmott, 2017, cited in Early, 2017) can affect five-year land supply as sites considered unviable are less likely to attract developer interest. Issues of deliverability must be considered following economic uncertainties such as the 2008 recession as sites suitable for development in previous economic conditions may now be unviable. Previous research has considered the impacts of the 2008 recession in terms of inhibiting developers from investing in land due to increased risks and reduced finance both for developers and buyers limiting the delivery of new homes (Cochrane et al, 2015; Payne, 2015). The recession also caused disruption to existing household projections, which were the basis of five-year land supply calculations, creating a gap between expected estimates and the economic reality. As a result, projections were not necessarily accurate causing ‘ambiguity’ (Harris et al., 2018). The impacts of the recession led to increased instability for British volume housebuilders resulting in a ‘historic decline in new housing supply’ (Payne, 2015, p3). However, ‘despite record house prices in the early 2000s’ (Monk et al, 2013, p2), housing supply and prices have in many areas not returned to the prerecession value. This may suggest that the 2008 recession has certainly ‘worsened the supply situation’ (Monk et al, 2013, p2) but not necessarily caused the decline in land supply in the first place. It is argued that the lack of supply is also a result of ‘unhelpful assumptions upon which housing policy has been based for many years’ (Kennett et al, 2013, p23) suggesting there are a variety of factors which have led to this decline.

The decline in housing land supply is also widely attributed to the complex and ambiguous relationship between the planning system and the housebuilding industry in the UK (Cochrane et al., 2015; Bramley and Leisham, 2005; Rydin, 2008; Payne, 2015). Contemporary policy reports, such as the Letwin Report (2018), identify the gap between the number of housing completions and the amount of land allocated for residential development, highlighting a further discrepancy between what is allocated for development by LPAs and what gets built by developers. Monk, Pearce, and Whitehead (2013) argue that that the housebuilding industry is partly responsible for a decline in land supply in the UK and subsequent failure to deliver residential development. This is due to the risk averse nature of the industry leading to fewer developments on brownfield sites, purchase of land under option agreements to decrease overall uncertainty or ‘holding on to land until prices rise’ during financially unstable periods (Monk et al, 2013, p8). However, within the Barker (2004) report, the idea of housebuilders holding on to land, or land banking, was not reported as a widespread phenomenon. This is echoed by the Calcutt Review of Housebuilding Delivery (2007) which stated that while there are some episodes of housebuilders holding on to land for prolonged periods of time, the issue of land banking is not particularly prevalent (Calcutt, 2007). As a result, the role of the housebuilding industry on housing land supply continues to be subject to misunderstandings. This ambiguity may be due to different stakeholders having distinctive priorities as various actors may agree on the urgency to deliver more land for housing whilst disagreeing on the volume and location of it (Harris et al., 2018).

## **Methods**

This research aims to understand the varied proposed reasons for the failure of housing land supply policy in Wales through a multi-client perspective. It does this first by considering the extent to which the policy has quantitatively achieved its desired outcomes over the past 12 years through a goal-attainment model of evaluation, before qualitatively exploring the reasons for failure from the perspective of different policy stakeholder groups. Using a stakeholder model of policy evaluation, the research considers whether the five-year land supply approach is

fit for purpose and achieves the outcomes that multiple groups of actors expect and desire (Vendung, 2012). In doing so, the research avoids unilateral perspectives to exploring housing land supply but rather acknowledges the diversity of opinions that exist and allows individual stakeholder groups to define their own merit-criteria as well as providing a goal-orientated baseline by which to contrast any perceived policy success or failure.

A case study of Wales, a devolved nation of 3.1 million people within the United Kingdom, is used to evaluate housing land supply policy. Following devolution in 1999, the country developed its own distinctive set of planning policies built around a unique legislative and governance framework (Heley, 2013). Planning policy guidance is provided by Welsh Government to 25 LPAs, each of whom must create a LDP to guide planning decisions, including the allocation of housing sites. Welsh Government (2015) places the responsibility to provide the ‘land that is needed to allow for new home building’ upon the planning system and relies on Planning Policy Wales (PPW), Wales’ national planning guidance document, and, prior to March 2020, the associated supplementary guidance document Technical Advice Note 1 (TAN 1) to do this. The 10<sup>th</sup> edition of PPW, PPW10, offers guidance on five-year land supply by stating that ‘planning authorities must ensure that sufficient land is genuinely available or will become available to provide a five-year supply of land for housing’ (Welsh Government, 2018, p57). PPW10 emphasises the importance of maintaining a five-year land supply to ‘support the delivery of the housing requirement’ (Welsh Government, 2018, p55) and relies on housing trajectories as a key tool in demonstrating ‘how the planning authority will maintain a five-year supply of housing land over the plan period’ (Welsh Government, 2018, p57). Before 2006, two methods could be used to calculate five-year land supply: the past build rates and residual method. From 2006 to March 2020, LPAs could only utilise the residual method that takes into account a combination of the total housing requirement identified in the development plan, housing completions, and annual need (Welsh Government, 2015). This contrasts with the past build rates method which relies on projecting build rates forward to calculate required supply.

In order to first explore the success of this approach, an exploration of changes in five-year land supply across Welsh LPAs was conducted between 2007 and 2018 (the most recent available data at time of writing). The analysis utilises annual Welsh Government housing land availability data collected from LPAs. This is used to assess whether the Welsh Government's goal of ensuring all authorities have a sufficient supply of land is being met and to provide context for the survey and semi-structured interviews. A survey comprised of open and closed questions was then sent out to planning and development professionals resulting in 32 respondents representing 12 LPAs, 8 housebuilders, and 12 private consultancies in Wales. The survey sought to understand the importance of the five-year land supply policy, the main factors influencing the supply of land, and the reasons for the failure of LPAs to consistently achieve supply targets. This was complemented with 8 semi-structured interviews of local and national planning professionals, housebuilders, and private sector planners.

### **Goal-orientated Failure in Housing Land Supply**

In the devolved government in Wales, a Joint Housing Land Availability Study (JHLAS) is the primary means of proving that a five-year housing land supply exists in each LPA (Welsh Government, 2015). This consists of the LPA 'providing an agreed statement of housing land availability' (Welsh Government, 2015, p4). The purpose of this is for LPAs to demonstrate that they have a readily available supply of residential land to deliver homes within the development plan period. This annual procedure aims to monitor and quantify residential land availability to aid the delivery of housing. Evidence in the JHLAS is utilised by local authorities to complete an Annual Monitoring Statement (AMR) which aims to 'assess the extent to which [Local Development Plan] strategies and policies are being achieved' (Welsh Government, 2015, p5). The housing land supply figure is included in the AMR; if the AMR 'identifies a shortfall in the required five-year housing land supply' (Welsh Government, 2015, p5), LPAs should consider whether the LDP, or parts of it, should be reviewed. Table 1 shows the five-year land supply by LPA between 2007 and 2018. Note that when an adopted LDP is not in place, the five-year land

supply is automatically calculated as 0 - this should, however, not be taken as an indication that there is no availability of land.

Table 1. Five-year land supply by Local Planning Authority Between 2007 and 2018 (in years of supply available).

Year	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Isle of Anglesey	5.3	5.7	5.1	4.6	5.1	5.8	5.4	4.7	0.0	0.0	*5.4	*6.3
Gwynedd	5.3	5.5	6.4	5.1	5.0	4.8	4.5	3.7	3.3	2.9		
Conwy	4.5	5.9	5.3	5.1	4.7	4.0	4.1	4.8	4.0	3.7	3.1	3.1
Denbighshire	6.3	5.4	5.2	4.6	4.5	3.5	3.5	1.8	2.1	2.0	1.8	1.6
Flintshire	2.8	4.2	0.0	6.0	6.8	4.5	4.1	3.7	0.0	0.0	0.0	0.0
Wrexham	14.9	7.5	6.1	5.4	3.9	3.5	3.4	3.1	0.0	0.0	0.0	0.0
Powys	7.1	8.6	7.9	6.4	5.2	4.1	3.4	1.5	1.9	2.2	0.0	7.0
Ceredigion	3.7	3.7	4.5	4.3	5.9	5.3	6.5	3.7	3.9	3.4	2.6	2.2
Pembrokeshire	6.1	5.4	5.7	4.5	4.7	4.3	4.9	5.3	5.0	5.1	5.1	4.5
Carmarthenshire	6.4	7.1	6.8	5.6	4.4	4.1	5.3	4.9	3.7	4.1	4.2	3.8
Swansea	8.3	6.5	5.8	0.0	5.8	5.1	3.3	2.7	3.0	3.2	0.0	0.0
Neath Port Talbot	6.5	4.9	4.7	4.7	5.8	6.0	2.6	2.5	5.5	5.0	5.3	5.0
Bridgend	8.1	6.6	6.2	5.2	5.5	5.1	5.7	6.0	5.4	5.1	4.0	3.4
Vale of Glamorgan	4.3	5.5	4.6	3.3	7.8	3.3	4.4	7.3	0.0	0.0	6.1	5.6
Rhondda Cynon Taf	5.1	4.0	5.3	7.6	5.3	4.5	3.7	2.8	2.4	1.5	1.3	1.4
Merthyr Tydfil	5.0	5.6	4.8	4.5	3.2	3.6	2.9	2.5	2.8	1.6	1.6	1.1
Caerphilly	17.3	22.5	21.2	14.2	4.3	3.5	2.9	2.5	1.9	1.5	2.1	2.3
Blaenau Gwent	8.9	7.8	7.1	8.9	7.9	7.6	3.3	2.6	2.0	1.3	1.3	1.3
Torfaen	10.2	9.1	9.6	5.9	4.8	6.3	6.6	4.7	4.8	3.6	3.6	3.9
Monmouthshire	3.8	5.9	5.3	4.3	5.0	4.4	3.6	5.2	5.0	4.1	4.0	3.9
Newport	7.2	5.3	4.6	3.5	4.3	7.0	7.4	9.2	6.3	5.9	6.1	5.6
Cardiff	7.9	6.0	4.5	3.4	2.3	2.9	3.2	3.6	5.2	3.8	3.6	3.5
Snowdonia National Park	6.9	6.3	5.2	5.7	7.6	9.3	9.5	8.3	7.0	5.4	3.6	3.0
Brecon Beacons National Park	4.9	3.7	3.6	3.2	2.8	1.9	1.3	5.5	5.8	5.0	4.8	3.9
Pembrokeshire Coast National Park	0.0	0.0	0.0	0.0	3.8	3.5	3.0	2.7	1.8	2.0	1.2	1.4

\*Figure is based on the Isle of Anglesey / Gwynedd Joint Local Development Plan adopted in July 2017.

0=Local Development Plan not in place.

Between 2007 and 2018, 22 LPAs out of 25 did not achieve a five-year land supply at least three years in a row, while 14 out of 25 did not achieve the target at least five years in a row. Two LPAs, Flintshire and Wrexham, have seen years of land supply uncertainty as they worked to develop a new LDP. At time of writing, neither had an adopted LDP in place.

Pembrokeshire Coast National Park, meanwhile, adopted their LDP in 2010, but despite this have never met their five-year land supply target since. Following the end of the recession in

2011, land supply levels noticeably declined from 2012 onwards in the majority of LPAs as development activity increased throughout Wales.

Up until May 2018, maintaining a five-year land supply provided a form of ‘incentive to bring land forward for housing’ (Monk et al., 2013). A lack of five-year land supply could act as a material consideration, a factor that should be taken into account when deciding on a planning application, in determining planning applications for housing allowing speculative planning applications for residential development on unallocated sites to be considered more favourably (Welsh Government, 2019). In response to the considerable number of LPAs not achieving their land supply targets, in May 2018 the planning minister’s *Call for Evidence on the Delivery of Housing Through the Planning System* temporarily dis-applied paragraph 6.2 of TAN 1 removing ‘considerable’ (Lichfields, 2019) weight to the ‘lack of a five-year housing land supply as a material consideration in determining planning applications for housing’ (Griffiths, 2018, p1). This temporary disapplication aimed to ‘alleviate some of the immediate pressure’ (Welsh Government, 2018) on LPAs who deal with speculative planning applications for unallocated land in order to reduce workload and allow them, instead, to concentrate on the preparation of an up-to-date LDP. The wide-spread inability of LPAs to maintain a consistent five-year land supply suggests a goal-orientated failure of the Welsh Government’s housing land supply policy and an impetus for a change in the application of the policy. How various stakeholders view housing land supply however suggests a slightly more nuanced assessment of the policy’s effectiveness.

## **Stakeholder Perceived Failure in Housing Land Supply**

### ***Public sector planners***

Public sector planners surveyed and interviewed attributed the inability to achieve a five-year land supply to a mix of private sector decisions, market decline during the recession, and poorly designed policy. Most emphasised the link between housing supply and housing delivery as the



residual method requires the inclusion of housing completions to accurately calculate the land supply. Public sector planners therefore tended to argue that the inability of developers to deliver houses on allocated sites was partly responsible for the lower levels of five-year housing land supply. The reasons for the lack of delivered sites was however contested, with some attributing a lack of housing completions with poor allocations of sites in the past:

In earlier LDPs in Wales, there was less of an emphasis on deliverability - but now more so. Land promoters are doing a lot more work to prove their site is deliverable [in order for it] to be included in the LDP (Public sector planner A).

Yet another interviewee noted there seems to be more work put into plans now to ensure that house builders are better consulted on viable sites and that 'in theory only sites that are deliverable and viable have been allocated' (Public sector planner B). A third public sector planner noted the difficult position local authorities are sometimes placed in, with housebuilders lobbying for more and more sites to be allocated to increase land supply in the plan while Welsh Government pushes back asking for evidence from the local authority that they in fact can deliver all of the sites included.

While interviewees acknowledged that allocated sites impacted land supply and needed to be viable, they were also critical of housebuilders land buying practices. In terms of viability, there were concerns that they were over-paying for allocated sites and then arguing that it was not possible to deliver them while meeting all the planning requirements expected of a large-scale development:

Because they are the one buying land, they are critical in terms of whether a site becomes viable or deliverable. Some sites would be more achievable if they pay a reasonable amount for land, that should be a starting point for it (Public sector planner B).

The same interviewee went on to highlight the difficulties of balancing the key principles of placemaking with the delivery of housing on allocated sites that meet the goals of the development plan:

It's tricky for planners because it is our role to aid the delivery of tricky sites but we could all deliver 10,000 houses ... the easy option is to allocate a lot of greenfield land. That's not particularly good planning (Public sector planner B).

Despite this, there was general acceptance of the five-year land supply as a useful and appropriate tool for planning purposes, and of the residual method specifically, with one interviewee noting that it was good to have a common methodology used throughout Wales. Where there was concern, however, was the way in which a lack of five-year land supply can be used as a material consideration to support an appeal for a site even if it does not follow good planning practice and that the need to ensure the supply may put particular pressure on local authorities to avoid appeals and thereby distract from other planning priorities.

Several public sector planners went on to argue that the inability to maintain a five-year land supply was in part because the methodology does not account for housebuilder behaviour, as 'they might have interest in a couple of sites but may release one site before they deliver another' (Public sector planner C) as part of their own market model of managing supply and demand. Additionally, the methodology expects local authorities to deliver a standard annual amount of housing contrary to how housing is built out, as:

A lot of authorities' strategies deliver very large sites that take a long time to come off the ground and if that happens a lot of sites are lost by appeal because you haven't got a five-year land supply ... the large sites being delivered now were actually allocated in the UDP [Unitary Development Plan] going back 10 or 15 years ago and we're kind of

delivering them now and it takes that long to deliver them in most cases (Public sector planner B).

Public sector planners generally note that they have established good relationships with housebuilders but they remain concerned about the ways in which the methodology creates pressure on them to avoid potential planning appeals by ensuring there is a continuous five-year land supply when some of the factors related to this, such as the economy and housebuilder behaviour, are outside of their control.

### ***Housebuilders***

Unlike public sector planners, private-sector housebuilders universally viewed poorly designed policy, at both the local and national level, as the core reason for a fall in five-year land supply. Housebuilders surveyed and interviewed frequently raised what they saw as an inappropriate allocation of sites and the disapplication of a lack of a five-year housing land supply as a material consideration in determining planning applications for housing as the main reasons for a lack of appropriate supply, noting:

That was the beginning, when the Local Authorities weren't allocating the right land – beginning to allocate 'rubbish bits of land' which started to come forward. I think there is a correlation between changes to Welsh Government policy and decline in five-year land supply figures (Housebuilder A).

Housebuilders frequently lamented the lack of engagement with local authorities during the development and examination of their LDPs. They suggested that viable and deliverable sites were not allocated despite warnings and 'robust reasons' from the industry that such sites would not be taken forward if included in the plan. This resulted in one developer noting that 'predictions have become reality and the result is LPAs having dwindling housing land supplies' (Housebuilder B).

Praise was however afforded to the JHLAS process. This was seen as part of a predictable, rule-based, approach to the identification of housing need. Developers viewed this as a particularly important system to maintain certainty and as an appropriate evidence base for appeal. The use of the JHLAS at the time in Wales was contrasted by one developer with the lack of such a process in England where it was noted that developers in England have to argue land supply separately every single time an application goes to appeal. The certainty that the system afforded in terms of precise land supply requirements was seen as a positive compared to the more discretionary allocation of sites in the actual LDP.

When asked to reflect on the impact of the 2008 recession on the effectiveness of land supply policy, one developer acknowledged how it impacted on delivery but suggested the calculation of supply through the residual method used by Welsh Government should have accounted for this, but in fact did not:

If you've had a period of time where a global recession has manifestly distorted the normality, you need to restore a form of normality and project that forward. So, we did have a time where global recession did impact on delivery that was projected forwards in terms of LDP and that impacted on the quality of LDP (Housebuilder A).

Housebuilder A went on to suggest that the economic environment for the development industry at any given time impacts the delivery and take up of supply more than the provision of supply itself, which is more an issue of policy.

Housebuilders were also critical of the changes to policy that resulted in the removal of five-year housing land supply as a material consideration in determining planning applications. It was suggested that the removal was not necessary for LPAs to 'catch-up' but more

importantly was seen as being counterproductive. One housebuilder noted that the disapplication of the policy acted as

basically a moratorium on development in authorities, such as Flintshire, who have no local plan. [As a result] there's no need for authorities to rush a plan, as they get to put their feet up for a few years! (Housebuilder C).

This was seen as a weakening of Welsh Government's hand in ensuring a five-year land supply as it limits the potential threat of an appeal being won for a lack of designated land and 'sends the message to Local Authorities and communities that five-year land supply is not important' (Housebuilder D).

### ***Planning Consultancies***

Those interviewed and surveyed working for planning consultancies tended to have variable views as to the reasons for the failure of local authorities to maintain a five-year land supply. This likely stems from their often more intermediary role between LPAs and housebuilders in the delivery of housing. Those interviewed and surveyed expressed frustration with the planning process and its impact on delivery of appropriate land supply while at the same time highlighting the impact of public sector cuts as a result of austerity:

Planning has a massive impact on slowing down the delivery of sites and that's a major frustration for major housebuilders in particular. The complexities of bringing sites forward – cuts in public sector have had a massive impact in having the available expertise in each Local Authority (Planning consultant A).

These policy teams are under resourced ... if they were all majorly well resourced, the situation would not be so bad. At the moment, they are quite reactive to problems (Planning consultant B).

Planning consultants agreed with housebuilders that considerable work needs to take place at the Local Planning Authority level in order to ensure viable sites are included in the land supply but also that the sites allocated are deliverable within the timeframes of the plan. Issues of timing and deliverability dominated the interviews, with concerns raised about initial delays in the creation of a plan, the time it takes to process and deliver sites, and the way in which delays in future local plan creation can leave a gap in land supply if not promptly reviewed and adopted:

By the time the LDP is adopted, they are already talking about starting to review it as they can take years to come through. Any potential delays can leave a hole between a dated local plan and an emergent local plan as LPAs are deemed subject to not having a five-year land supply (Planning consultant B).

As noted earlier, if LPAs do not have a local plan adopted then the assumption is that they have no land supply for the purposes of planning appeals. This can be advantageous to housebuilders who can argue for approval to build on sites not included in the previous plan. This was in part the logic for the disapplication of paragraph 6.2 of TAN 1 that removed 'considerable' weight to the lack of a five-year housing land supply as a material consideration when approving a planning application. The vast majority of planning consultants disapproved of this, arguing

The assertion that reducing the number of 'speculative applications' will allow Local Planning Authorities to focus on Local Development Plan reviews is spurious as a number of Local Planning Authorities, many with woefully low land supplies, are already required by TAN 1 to review their Local Development Plans but have not commenced due to there being no repercussions, despite the requirement for a five-year land supply (Planning consultant C).

The lack of repercussions for not producing an updated LDP was highlighted by most planning consultants as an indication to LPAs by Welsh Government that they no longer need to worry about maintaining an appropriate supply of land for housing. There was a concern that this would result in areas with already low levels of housing land supply continuing to under-supply for new housing, with one consultant noting ‘there’s no denying that the disapplication of this paragraph has resulted in less applications being approved and submitted where the five-year land supply issue was a key factor’ (Planning consultant D).

Some benefits of the disapplication were however highlighted in relation to it allowing an emphasis on the plan-led system in authorities without a five-year land supply as it removes an avenue for an appeal that would lead to an allocated development. This was seen as a potential positive for residents who may feel decisions about development were being made in line with what was outlined in their local plan as well as for local planners who could give more credence to other factors when making a decision about a planning application.

## **Discussion and Conclusion**

The preceding discussion reflects on five-year land supply policy failure at a particular moment in Wales. Having been introduced as a foundational element of plan-making and decision-making, the policy saw the introduction of added ambiguity as the importance of maintaining five-year land supply was downgraded by the government. The approach to maintaining five-year land supply was then subsequently altered, with planning authorities having to utilise ‘housing trajectories’ to monitor housing delivery instead. By drawing on a combination of Vedung’s (2013) merit and collegial models of policy evaluation we have been able to identify the various ways in which five-year land supply policy has failed in Wales.

From a goal-orientated approach it is clear that the five-year land supply policy has consistently not achieved its objective. Few LPAs in Wales have maintained a five-year supply over the past ten years and housing shortfalls continue to be, as Emmett (2015) reflected,

‘ingrained’ within the planning system. Through the use of a stakeholder perspective, we were able to understand the competing arguments for why this is. Blame for the policy failure is attributed, to varying degrees, on the inability of Local Planning Authorities to provide the ‘right kind of housing supply’, resourcing issues, the implications of the indicators used for the residual method and impact on the timing of housing delivery, the wider influence of the recent recession on housing finance, the management of individual housing supply by housebuilders, and confused messaging by Welsh Government about the value of five-year land supply as a result of policy changes.

Largely absent from the discussions was the politicisation of housing (Hilber, 2015) as stakeholders focused more on the details of the policy environment they were working within rather than the broader interaction between housing delivery and local debates of where housing should be situated as a key supply constraint. Instead what was clear was the ramifications of a continued disconnect between the identification of five-year land supply and viable sites for housing delivery (Early, 2017). Interestingly, however, two perspectives emerged on this issue, one arguing that the LPAs too often failed to identify sites that housebuilders could profitably deliver and the other that argued the reasons some sites were unprofitable was due to housebuilders paying too much for them. This tension between the housebuilding industry and the planning system is not new (Rydin, 2008; Payne, 2015), yet those interviewed suggested a much closer alignment between the two has emerged in recent years in Wales and may as a result ultimately assist in the delivery of a five-year land supply.

Despite the goal-orientated failure in achieving five-year housing land supply as well as a general recognition of the policy’s failure by public sector planners, housebuilders, and planning consultants, the need to maintain a five-year land supply as a policy objective was not questioned. It remains a well-supported means of ensuring housing delivery within the planning system, but rather our interviews and surveys suggest a multi-faceted range of reasons for its failure. The fact that Welsh Government has now abandoned the long-standing method for calculating land supply for housing rather than attempt to correct these failings suggests a new series of issues may now stand in the way of housing delivery.



The preceding research adds to the call for greater understanding of how housing markets and land use regulations interact in different contexts (Gurran and Phibbs, 2013). More broadly, the Welsh case highlights the need to carefully consider the purpose of residential land supply management through planning policy, the importance to be placed on the exact methodology applied, as well as how it is implemented in practice so as to take into account the externalities that might result from the policy. This includes reflecting on the role of different stakeholders involved in the successful implementation of land supply policy as well as how stakeholder behaviour is accounted for.

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