

Matter 9 Housing Supply: DBC Hearings Note

5 Years Deliverable Land Supply Update:

Five percent buffer-

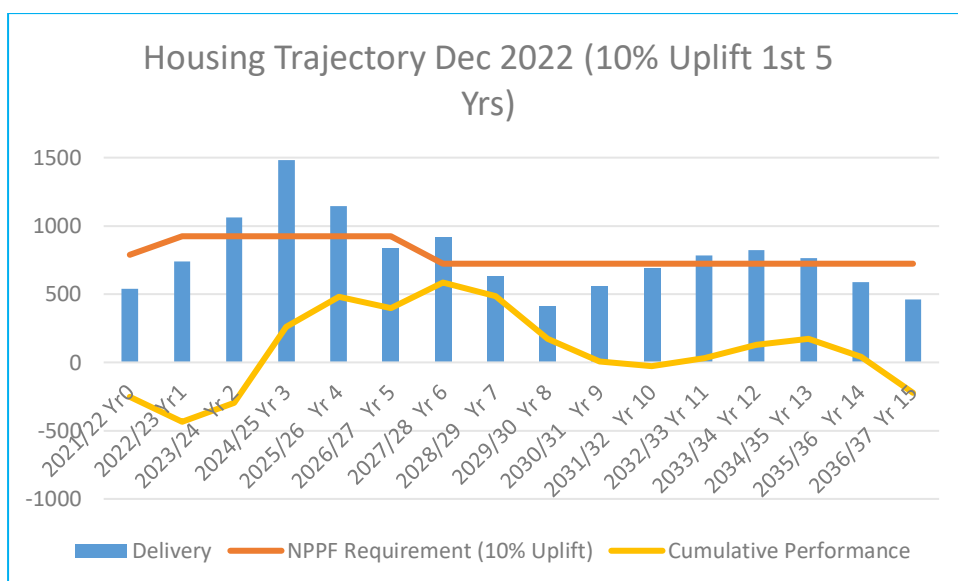
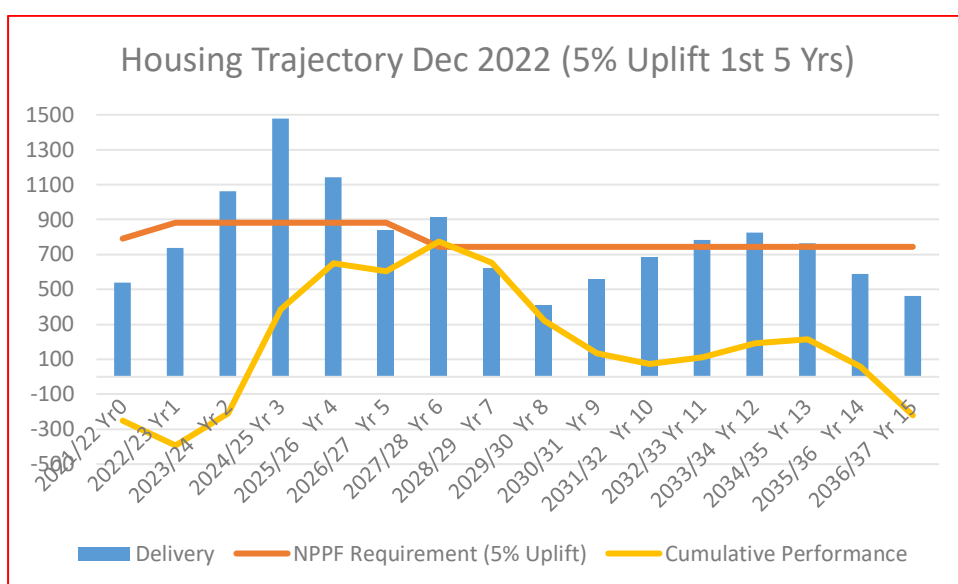
A. Historic shortfall from 1 st April 2021 – 31 st March 2022 (540 completions Vs 790 proposed annual requirement).	790-540 =250
B. Base requirement to supply 5 years' worth of 790 units	5x790 =3,950
C. Unbuffered requirement	A+B =4,200
D. NPPF Para 74 requires that a 5% buffer (moved forward from later in the plan period) should be applied to 5 year housing land supplies to ensure choice and competition in the market. Employing a method of buffering both the shortfall and base requirement results in the final total requirement.	C*1.05 =4,410
E. The deliverable land supply projection for 1 st April 2022 – 31 st March 2027 detailed in the latest SHLAA update (Dec 2022 post Examination hearings version).	5,265
F. Deliverable housing land supply result (5% buffer)	(E/D)*5 = 5.97 yrs

Or with the sensitivity test of a ten percent buffer, rows A to C (and E) are unchanged, but the final calculation is amended-

D. NPPF Para 74 also includes provision for LPAs to add a 10% buffer where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan. Employing a method of buffering both the shortfall and base requirement results in the final total requirement.	C*1.1 =4,620
E. The deliverable land supply projection for 1 st April 2022 – 31 st March 2027 detailed in the latest SHLAA update (Dec 2022 post Examination hearings version).	5,265
F. Deliverable housing land supply result (10% buffer).	(E/D)*5 = 5.70 yrs

15 Years Land Supply Update & Trajectory:

- The total requirement for the plan period is effectively 16 years of 790 units, to cover the period 1st April 2021 – 31st March 2037. This equates to **12,640 units**.
- Together, completions and SHLAA developable sites amount to a total of **12,419 units**:
 - The completions figure for the 2021/22 financial year was 540 units.
 - The 15 year land supply identified on specific developable sites in the latest SHLAA update (December 2022 Post EiP Hearings version) is 11,879 units.
- This produces an undersupply (on specific, developable sites) over the 16 year period 2021-2037 of 221 units.
- This all leads to the following trajectory diagrams. As with the Five Year Deliverable Supply with a 5% buffer for the next five years, a 10% sensitivity test version is also provided.



2021 Base Date:

- NPPG (008 Reference ID: 2a-008-20190220) states that strategic policy-making authorities need to calculate need at the start of reviewing policies, and keep it updated. There is also a 2-year grace period from the time the plan is submitted.
- The Plan was Submitted December 2021.
- Need figure of 750dpa was based on the most recent affordability ratio available – 25th March 2021.
- That data can therefore be relied upon until December 2023.
- March 2021 data was released on 25th March 2021. The new Plan start date is 1st April 2021. The two dates are 1 week apart. On the face of it, it is an appropriate, and evidentially consistent, alignment.
- The 2021 data records house prices for the year ending September 2020, and income data ending April 2020. As such the data is approximately 1 year old (for incomes) and 6 months old (for house prices) upon its release.
- There is not a compelling argument for starting the plan a year earlier, as this would add in an off-set the other way, based on the 2021 affordability data (for example there would be 6 months' worth of impact of unused house price data (April-Sep 2021)).
- The ratio is a calculation at a point in time, of two trend datasets. The ratio will change every year, and due to the off-set datasets, will never be perfectly aligned.
- In any event the ratio accounts for previous over/under supply of housing (see NPPG Para 011 Reference ID: 2a-011-20190220)
- It is important for policymaking that a point is chosen, and adhered to, for the duration of the examination of a Plan. 2021 is the most appropriate earlier start date having regard to the above.