

Mid Devon Local Plan Review 2013-33

Housing Land Supply Update

*Addendum to January 2019 update in response to
the Inspector's Post Hearings Advice Note*

June 2019

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Summary

- This document responds to the Inspector's Post Hearings Advice Note (ID12), received on 21 May 2019, specifically to address his concerns raised regarding the timescale for delivery of the Cullompton Town Centre Relief Road (TCRR) and the impact of this on the proposed housing trajectory for the Local Plan Review.
- The Council has carefully assessed the Inspector's post hearing advice and considered his comments in the round. The Council has sought to clarify the intersection between the housing land supply and the timing of TCRR and has taken a conservative approach on the timing of the delivery of the TCRR for Local Plan housing supply purposes. This should not be taken as detracting from the Council's aspiration to achieve speedy delivery of the TCRR.
- A revised housing trajectory is set out in Appendix 1. This includes actions following from the Inspector's suggested Main Modifications at points 1 and 2 of his advice note to boost housing delivery in the early years of the Plan. It also ensures that no part of the first five years' trajectory is dependent upon the completion of the TCRR.
- Five year housing land supply calculations have been updated to reflect the changes in housing supply indicated by the revised housing trajectory. As with the previous HLS update (January 2019), these calculations are presented for four scenarios which follow different approaches to the calculation of five year housing supply. The calculations demonstrate that a five year supply of deliverable sites will be maintained over the initial five years and subsequent periods even in the most cautious scenario.
- For the initial five year period (2018/19 – 2022/23), a housing land supply of 6.53 years is demonstrated, based on the most appropriate approach in the context of Mid Devon's planned housing supply and historic delivery. No part of the housing land supply in this period is dependent on delivery of the TCRR.
- In the subsequent five year period (2023/24 – 2027/28), a housing land supply of 9.10 years is demonstrated. Throughout the plan period a five year housing supply can be maintained which takes account of a precautionary approach to delivery of the TCRR and other infrastructure. This is the case even when the most conservative assumptions are applied to the calculation of five year land supply.
- In summary the proposed changes to the housing trajectory are as follows:
 - The first year that the East Cullompton allocation (CU7-CU12) is expected to deliver housing has been put back a year to 2023/24. This is based on a precautionary approach which sees the latest delivery of the TCRR by the end of 2023. This ensures that no part of the trajectory in the first five year period is dependent on completion of the TCRR.
 - The site at Higher Town, Sampford Peverell (Policy SP2) is now expected to fully build out within the initial five year period. This reflects the Council's intention to make 'Main Modifications' to Policy SP2 in accordance with the Inspector's advice; these modifications would remove conditions restricting the delivery of the site until later in the plan period.

- The site 'Land at Colebrook' (Policy CU21) is expected to partially build out within the first five years reflecting the proposed removal of its 'contingency' status.

- No change is proposed to the housing trajectory for the North West Cullompton allocation, however clarification is provided to explain previous site delivery assumptions and how the delivery of the later phase (750 dwellings) takes account of the cautious assumption over the timeframe for delivery of the TCRR for local plan trajectory purposes. An initial phase of 600 dwellings at NW Cullompton can be completed before the TCRR, but will be expected to make financial contributions towards it.

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Introduction

- 1.1 This paper provides an addendum to the Mid Devon Local Plan Review Housing Land Supply (HLS) Update (January 2019), which was appended to Mid Devon District Council's hearing statement (MH-MDDC-1-5) ahead of the February 2019 Local Plan Review (LPR) Main Hearings.
- 1.2 The Inspector issued a Post-Hearings Advice Note on 21 May 2019 [ID12]. The Inspector's note raised concerns about the Local Plan Review's ability to demonstrate a five year supply of deliverable housing sites in the early years of the plan. These concerns relate to timescales for delivery of the Cullompton Town Centre Relief Road (TCRR) and the extent to which this impacts on the published housing trajectory (included in the January 2019 Housing Land Supply Update). The proposed allocation sites which are affected by the deliverability of the TCCR are North West Cullompton (CU1-CU6) and East Cullompton (CU7 – CU12).
- 1.3 In light of these concerns, the Inspector has requested *'a projected housing trajectory for years 1-5 and 6-10 incorporating realistic assumptions about the delivery of the TCRR, demonstrating how a five-year supply of deliverable housing sites will be maintained throughout these periods'*.
- 1.4 This addendum responds to this request by setting out a revised housing trajectory which makes very cautious assumptions about delivery of the TCRR for the purposes of demonstrating the Local Plan housing supply. The revised trajectory also incorporates the Council's suggested actions to boost housing delivery in the early years of the plan. These actions follow from the Inspector's suggested Main Modifications at points 1 and 2 in his advice note in relation to maintaining a five year supply of deliverable housing sites. Based on the revised trajectory, updated five year housing land supply calculations for years 1 to 5 and subsequent five year periods are provided. The calculations demonstrate that a five year supply of deliverable sites will be maintained over the initial five years and subsequent periods.
- 1.5 This addendum also provides an explanation for the updates to the proposed housing trajectory. Changes to the trajectory have been made for the following proposed Local Plan Review housing allocations: East Cullompton (CU7 – CU12), Higher Town (SP2) and Colebrook (CU21). Reasons for amending the proposed trajectory for these allocations, the evidence and assumptions used to support these changes and an explanation of the resulting anticipated build outs are provided in this addendum. No changes to the housing trajectory are proposed for the North West Cullompton allocation (CU1-CU6); however, clarification is provided on previous site deliverability assumptions and how the projected build out for this allocation aligns with conservative assumptions for the timing of the delivery of the TCRR. For all other Local Plan Review proposed allocation housing sites, the housing trajectory remains unchanged and the Housing Land Supply Update (January 2019) remains the most current source of information.

Housing Land Supply Evidence and Assumptions: June 2019 update in response to the Inspector's Post-Hearings Advice Note

Baseline monitoring data

- 2.1 As was the case with the January 2019 update, the Council's housing monitoring data as of 31 March 2018 (as set out in the HLA Summary (2018)) provides the baseline data for the updated Local Plan Review (LPR) housing trajectory shown in Appendix 1 of this addendum. The Council will not be in a position to publish updated monitoring data for the year 2018/19 until later in 2019; as such the 2018 HLA data remains the most up-to-date monitoring data available.

Delivery of Cullompton Town Centre Relief Road (TCRR)

- 2.2 Following the Local Plan examination main hearings there has been significant progress toward securing HIF funding for the delivery for the TCRR. On 30th May 2019 the Council resolved to enter into a grant funding agreement with Homes England to secure £10 million Housing Infrastructure Fund monies towards the TCRR thereby providing greater certainty to this scheme. The detail for this grant funding agreement is still the subject of ongoing discussions between the Council and Homes England. The Council remains committed to achieving speedy completion of the relief road and is working with Homes England to achieve this. For the purposes of the Local Plan Review's housing trajectory it is assumed that the TCRR will be completed by the end of 2023. This reflects a precautionary approach towards the timing of the TCRR, and homes dependent upon it, based on the concerns raised in the Inspector's Post Hearings Advice Note.
- 2.3 On the basis of technical evidence, 600 dwellings at NW Cullompton can be included in the trajectory to start delivering in the first five years. These 600 dwellings are not dependent upon the TCRR in the immediate term, although they will be expected to make financial contributions towards it.

Clarifications and updates to site delivery assumptions

- 2.4 An updated housing trajectory is provided in Appendix 1. This highlights the proposed allocations where there have been changes to the figures presented in the trajectory published as part of the January 2019 HLS update (East Cullompton, Higher Town and Colebrook).
- 2.5 Reasons for amending the proposed trajectory for these allocations, the evidence and assumptions used to support these changes and an explanation of the resulting anticipated build outs are provided below. For North West Cullompton, clarification is provided on previous site deliverability assumptions and how the projected build out for this allocation aligns with assumptions over the timing of the delivery of the Cullompton Town Centre Relief Road (TCRR).
- 2.6 For the four sites discussed below, the table in Appendix 2 provides a summary of current site status, delivery assumptions and how these align with delivery of the TCRR.

North West Cullompton

- 2.7 A masterplan for North West Cullompton was adopted in February 2016. The North West Cullompton allocation proposes 1350 dwellings of which 600 are currently subject to three separate planning applications (one full application for 200 dwellings and two outline applications for 200 dwellings each). This initial phase reflects Devon County Council Highway

advice that 600 dwellings can come forward from the North West Cullompton allocation ahead of the completion of the Cullompton Town Centre Relief Road (TCRR), so long as they make financial contributions towards it. This is explained further in paragraph 4.8 of the Statement of Common Ground (SCG10) between MDDC, DCC and Highways England. For the purposes of the housing trajectory, the anticipated build out on each of the three sites subject to planning applications (600 dwellings) has been considered separately from the remainder of the allocation (750 dwellings) which is dependent on the delivery of TCRR and therefore projected to be delivered later in the plan period.

2.8 In addition to the TCRR, the masterplan sets out the requirement for a link road between Willand Road and Tiverton Road, through the North West Cullompton allocation. This requirement will be triggered by the occupation of the 500th unit on the North West Cullompton allocation. This link road will be funded and delivered by developers, with requirements for this to be set out within Section 106 agreements in connection with the current applications. The housing trajectory suggests completion of the 500th unit in 2024/25 which is therefore the latest point at which the linking road could be completed (although clearly the road could be delivered earlier than this). Provision of this link road together with the TCRR would enable delivery of the second phase of the allocation (750 dwellings). Based on the anticipated timescales for the TCRR set out above and the cut off point for delivery of the linking road, 2024/25 would therefore be a reasonable conservative estimate for delivery of the second phase to begin.

2.9 The January 2019 HLS update set out projected commencement and build out for each of the elements making up the North West Cullompton allocations (i.e. the three sites subject to planning applications and the remainder of the allocation); these elements then feed into an overall trajectory for the North West Cullompton allocation which is set out in the Local Plan Review (LPR) housing trajectory (Appendix 1). How each element has contributed to the overall trajectory for the allocation is summarised in Table 1 below.

TABLE 1: Summary of proposed North West Cullompton build out

	Years 1- 5					Years 6 -10					Years 11+					Total
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	
West of Willand Road* (F)	0	0	25	50	50	50	25	0	0	0	0	0	0	0	0	200
North of Rull Lane* (O)	0	0	12	25	25	50	50	38	0	0	0	0	0	0	0	200
North of Tiverton Road * (O)	0	0	12	25	25	50	50	38	0	0	0	0	0	0	0	200
Remainder of allocation	0	0	0	0	0	0	25	100	100	100	100	100	100	100	25	750
Annual totals	0	0	49	100	100	150	150	176	100	100	100	100	100	100	25	1350
Five year totals	249					676					850					

*Part of allocation not dependent on TCRR delivery F = Full Application O = Outline application

- 2.10 The commencement and build out rates for each of the elements shown in table 1 have followed HELAA methodology assumptions. The site subject to an application for full planning permission has been assumed to build out a faster rate than the sites currently subject to applications for outline planning permission and the remaining part of the allocation. It can be seen that the trajectory assumes that completions of these remaining 750 units will be held back until 2024/25, taking account of delivery of the Willand Road – Tiverton Road link and the Town Centre Relief Road (TCRR). The trajectory also assumes that the second phase will be delivered as a single 750 dwelling site. This provides a conservative estimate of likely build out, whereas it is likely that the development will in practice come forward as separate sites and therefore be delivered at an accelerated rate.
- 2.11 In summary, it can be seen that the delivery of the first phase of the North West Cullompton allocation (600 dwellings) is not dependent upon delivery of the TCRR, so long as it makes financial contributions towards it. Only part of this first phase of the development (249 dwellings) contributes to the projected housing supply in the first five year period. The anticipated delivery of the remaining phase of NW Cullompton reflects a precautionary approach for local plan housing trajectory purposes which would see the completion of the TCRR by late 2023 and linking road by 2024.

East Cullompton

- 2.12 A draft masterplan for the East Cullompton allocation was published for consultation in January 2019. The allocation is intended to form the first phase of the Culm Garden Village. As agreed with the Highway Authority and reflecting the Council's working assumptions in the masterplan, 500 dwellings can come forward as part of an accelerated delivery in advance of the remainder of the allocation (1250 dwellings). The delivery of this initial phase of the development is dependent on completion of the Cullompton town centre relief road (TCRR). A planning application for the TCRR is expected in autumn 2019. The Council is currently working on the precautionary assumption, for Local Plan Review housing trajectory purposes, that the relief road will be delivered by the very latest in 2023. After the first 500 units, the remainder of the allocation (1250 dwellings) is expected to require a strategic highway intervention.
- 2.13 To reflect these constraints, the amended trajectory for the East Cullompton allocation sees completions from the initial phase beginning in 2023/24. This is outside the initial five year period so it is not anticipated that the East Cullompton allocation will contribute to the initial five year housing land supply. With completions not beginning until beyond the initial five year period, this provides a realistic lead in time for this development. From 2023/24, there is a gradual acceleration in delivery across the allocation, reflecting the additional infrastructure requirements for the later phases of this development.
- 2.14 The trajectory broadly aligns with the HELAA methodology, assuming that the allocation will come forward as multiple sites with different developers on each site. At its maximum rate of delivery, the trajectory assumes 200 dwellings are completed annually across the allocation. This is considered a reasonable assumption that would reflect four developers building out separate sites at 50 dwellings per year. However, it is recognised that the allocation and wider Culm Garden Village project represent a unique type of development that delivery models will not necessarily accurately reflect. In developing an appropriate trajectory for this allocation,

the Council has therefore followed advice from the land promoters (Lightwood Land) and the Highway Authority.

- 2.15 Table 2 below shows the anticipated trajectory for housing delivery at the East Cullompton allocation. The trajectory for this allocation has been put back by a year from the previously published version of the trajectory (January 2019); this ensures delivery aligns with the conservative assumptions taken regarding the timing of the TCRR.

TABLE 2: Summary of proposed East Cullompton build out

	Years 1- 5					Years 6 -10					Years 11+					Total
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	
East Cullompton	0	0	0	0	0	50	125	175	200	200	200	200	200	200	200	1750
Five year totals	0					750					1000					

Land at Colebrook, Cullompton

- 2.16 This site was previously included in the Local Plan review on the basis of being a contingency site. Devon County Council has advised that the site is not dependent upon significant additional highways infrastructure. A main modification has been proposed to remove the contingency status of this site and instead include this in the LPR as a standard housing allocation. As such this site is now included as part of the housing trajectory. This change follows the Inspectors suggestion in his advice note of bringing forward contingency sites and those currently restricted in terms of timing with no good reason.
- 2.17 The proposed build out for the Colebrook allocation follows HELAA market conditions model assumptions. This results in an additional 62 dwellings in the supply for the first five years as shown in table 3 below.
- 2.18 This site is currently subject to an outline planning application (19/00118/MOUT) for 105 dwellings. Planning officers have recommended the application for approval.

TABLE 3: Summary of proposed Colebrook build out

	Years 1- 5					Years 6 -10					Years 11+					Total
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	
Colebrook	0	0	12	25	25	38	0	0	0	0	0	0	0	0	0	100
Five year totals	62					38					0					

Higher Town, Sampford Peverell

- 2.19 In accordance with the Inspector’s recommendations in the Post-Hearing Advice Note, the tie to the Junction 27 development currently included in the policy SP2 will be removed. Devon County Council has advised that the proposal is not dependent upon improved access works to the A361, and therefore it is proposed to remove criterion b) of Policy SP2. These are proposed as main modifications.
- 2.20 This removes any restriction on the timing of the development coming forward and implements the Inspector’s suggestion in his advice note to bring forward ‘*allocated sites currently restricted in terms of timing with no good reason, the Policy SP2 site for example*’.
- 2.21 The proposed commencement and build out for the Higher Town site has therefore been amended to take account of the removal of any restriction on the timing of its delivery and align with the HELAA market conditions model assumptions. The site is therefore anticipated to fully built out within the initial five year period rather than commencing delivery in 2022/23. As shown in table 4 below, this results in 60 dwellings in the five year supply for 2018/19 – 2022/23, a net increase of 48 compared with the position set out in the January 2019 HLS update (Hearing statement MH-MDDC-1-5).
- 2.22 This site is currently subject to an outline planning application for 60 dwellings (17/01559/MOUT).

TABLE 4: Summary of proposed Higher Town build out

	Years 1- 5					Years 6 -10					Years 11+					Total
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	
Higher Town	0	0	12	25	23	0	0	0	0	0	0	0	0	0	0	60
Five year totals	60					0					0					

Five Year Housing Land Supply Calculations

- 3.1 This addendum provides calculations of five year housing land supply using the updated housing trajectory (appendix 1). This is based on four scenarios, following the approach set out in the January 2019 HLS update (see Hearing Statement MH-MDDC-1-5):
- 1) 'Sedgefield' approach (shortfall delivered over the initial 5 year period) with 20% buffer.
 - 2) 'Sedgefield' approach (shortfall delivered over the initial 5 year period) with 5% buffer.
 - 3) 'Liverpool' approach (shortfall delivered over plan period) with 20% buffer.
 - 4) 'Liverpool' approach (shortfall delivered over plan period) with 5% buffer.
- 3.2 The HLS update (January 2019) sets out further explanation of the assumptions used in each scenario and the reasons why the Council considers scenario 4 (Liverpool approach with 5% buffer) to be the most appropriate approach. For this addendum, it remains the Council's position that the Liverpool approach with a 5% buffer is the most appropriate approach given the context of Mid Devon's planned housing supply and historic delivery. However in order to demonstrate that a five year housing land supply can be achieved using the most conservative assumptions, scenarios that include a 20% buffer and follow the Sedgefield approach are also presented.

Summary of Results

- 3.3 Full detail on the updated calculation of five year housing land supply for scenarios 1- 4 above is set out in Appendix 3.
- 3.4 The results from each five year land supply scenario for the initial five year period (2018/19 - 2022/23) are as follows:
- 1) 'Sedgefield' approach with 20% buffer: 5.30 years' supply
 - 2) 'Sedgefield' approach with 5% buffer: 6.06 years' supply
 - 3) 'Liverpool' approach with 20% buffer: 5.71 years' supply
 - 4) 'Liverpool' approach with 5% buffer: 6.53 years' supply
- 3.5 The Council considers that the most appropriate approach is to apply a 5% buffer and adopt the 'Liverpool' approach, and on this basis there is 6.53 years of supply (scenario 4). However the results for the other scenarios demonstrate that a five year supply can still be achieved if more conservative assumptions are applied.
- 3.6 In the subsequent five year period (2023/24 – 2027/28), the calculations set out in Appendix 3 demonstrate a five year supply of 9.10 years.

- 3.7 These results show an improvement on previous calculations of five year housing land supply. This reflects the additional housing supply now included in the trajectory for years 1-5 and 6-10.

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Conclusion: how land supply matters in the Inspector's Post-Hearings Advice Note have been addressed

4.1 The Local Plan Review (LPR) housing trajectory has been revised to reflect the Inspector's request for this to incorporate '*realistic assumptions*' regarding the timing of the delivery of the Cullompton Town Centre Relief Road (TCRR). The revised trajectory also incorporates the Council's suggested actions to boost housing delivery in the early years of the plan. These actions follow from the Inspector's suggested Main Modifications at points 1 and 2 in his advice note in relation to maintaining a five year supply of deliverable housing sites. Incorporating these amendments, it has been demonstrated that:

- There is an overall increase in the housing supply across the plan period and in the initial five year period.
- No part of the housing supply in the initial five year period (2018/19 – 2022/23) is dependent on the timing of the delivery of the TCRR.
- Beyond the initial five year period, a five year housing land supply can be maintained when a precautionary approach is taken to the timing of the delivery of the TCRR.
- Allocations in Tiverton and Crediton, that are not dependent on the TCRR, form a significant part of the housing land supply in years 6-10 and beyond.
- Based on the most appropriate approach in the context of Mid Devon's planned housing supply and historic delivery (see paragraphs 3.2-3.5 above) , the Local Plan Review can demonstrate a five year housing land supply of 6.53 years for the initial five year period (2018/19 -2022/23).
- In the subsequent five year period, there is a five year housing supply of 9.10 years.
- In all cases throughout the plan period, even using the most conservative assumptions, a five year housing land supply can be achieved.

4.2 As with the previous HLS update (January 2019), a cautious approach is taken to the land supply calculations by:

- Presenting a 'worst case scenario' following the 'Sedgefield' approach to addressing previous shortfall and applying a 20% buffer to the housing requirement (alongside what the Council considers the most appropriate approach set out above).
- Not including an allowance for 'windfall' completions (beyond those already included in existing commitments): as set out in paragraph 2.39 of the January 2019 HLS update (Hearing Statement MH-MDDC-1-5), an additional 258 dwellings could be added to the housing land supply figure if a windfall allowance was included.
- Incorporating conservative assumptions about site build out based on the HELAA 'market conditions' model unless other evidence is available.

4.3 In addition, the Local Plan Review provides contingency and flexibility to deal with uncertainties that may affect future land supply:

- The Local Plan Review proposes a 'contingency' site for housing at Tidcombe Hall (TIV13). If housing delivery across the district falls below defined 'action levels' set out in Policy S4 'Ensuring Housing Delivery' or a five year supply of deliverable sites cannot be demonstrated, this site will be released to boost housing supply.

- The Local Plan Review makes provision for approximately 17%¹ more housing than is required over the entire plan period (2013-2033)

4.4 As set out previously in the HLS update (January 2019) and reflected in the trajectory presented in Appendix 1, existing 'commitments' make up a significant part of the housing land supply for the first five years. Of the 2801 dwellings that make up the anticipated supply in years 1-5, 2013 are current commitments as of 31st March 2018 (471 under construction and 1542 with planning permission). Therefore, the housing supply in the first five years is not overly reliant on unconsented allocations; those sites included in the 'commitments' figures, having overcome potential hurdles in the planning system, now have a greater certainty of delivery.

¹ Local Plan housing requirement= 7860; Local Plan provision (updated trajectory June 2019) = 9234 deliverable dwellings.

APPENDIX 1: Local Plan Review Housing Trajectory (June 2019 update - changes from January 2019 version shown in red)

Location/Site	Policy	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	Total
Tiverton																						
Eastern Urban Extension	TIV1-TIV5														25	100	100	100	100	100	25	550
Howden Court	TIV9									10												10
Roundhill	TIV10								12	8												20
Phoenix Lane	TIV12							4			25	31										60
Tidcombe Hall (contingency)	TIV13																					0
Blundells School	TIV16							12	25	25	50	50	38									200
Commitments							107	149	136	143	135	108	100	100	100	100	97					1275
Completions		93	70	98	89	128																478
Tiverton Total		93	70	98	89	128	107	149	152	180	178	183	181	138	125	200	197	100	100	100	25	2593
Cullompton																						
NW Cullompton	CU1-CU6							49	100	100	150	150	176	100	100	100	100	100	100	25		1350
East Cullompton	CU7-CU12										50	125	175	200	200	200	200	200	200	200		1750
Ware Park and Footlands	CU14												25	13								38
Colebrook	CU21							12	25	25	38											100
Commitments							91	71	53	25	12											252
Completions		87	78	44	98	238																545
Cullompton Total		87	78	44	98	238	91	71	114	150	137	238	275	376	313	300	300	300	300	300	225	4035
Crediton																						
Red Hill Cross	CRE2									12	50	50	23									135
Woods Group	CRE4										8											8
Pedlerspool	CRE5							12	25	25	50	50	38									200
Sports Fields	CRE6									12	50	50	8									120
Stonewall Lane	CRE7										25	25										50
Land at Barn Park	CRE8							12	8													20
Alexandra Close	CRE9							12	3													15
Commitments							103	99	54	29	10											295
Completions		58	31	18	17	12																136
Crediton Total		58	31	18	17	12	103	99	90	65	59	183	175	69	0	0	0	0	0	0	0	979
Rural sites																						
Newton Square	BA1									5												5
Hollywell	BO1								12	8												20
Hele Road	BR1							7														7
Barton	CH1								12	8												20
Land off Church Lane	CB1								12	8												20
Barnhill Close	CF1							7														7
Linhay Close	CL1							6														6
Land adj Fishers Way	HA1							10														10
Greenaway	MO1								12	8												20
Former Tiverton Parkway Hotel	SP1							10														10
Higher Town	SP2							12	25	23												60
Fannys Lane	SA1							8														8
Old Butterleigh Road	SI1						8															8
The Garage	SI2						5															5
South of Broadlands	TH1							12														12
Land east of M5	WI1							12	25	5												42
Commitments							273	242	255	26												796
Completions		82	137	128	100	124																571
Rural Sites Total		82	137	128	100	124	273	255	339	124	65	0	0	0	0	0	0	0	0	0	0	1627
Total (Mid Devon - all areas)		320	316	288	304	502	574	574	695	519	439	604	631	583	438	500	497	400	400	400	250	9234
Five year totals				1730			2801				2756						1947					
Cumulative five year totals				1730			4531				7287						9234					

APPENDIX 2: Updates/clarifications on the assumptions and evidence used to inform projected build out for selected LPR allocations

* Please refer to housing trajectory (Appendix 1) for full details of projected build out for site.

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Total Commitments (as at 31st March 2018)	Anticipated housing delivery years 1 -5*	Anticipated housing delivery years 6 -10*	Current site status: masterplanning, applications etc.	Delivery assumptions: HELAA assumptions or other evidence where available.	Impact of timing of TCRR delivery on housing trajectory
North West Cullompton	CU1- CU6	1350	0	249	676	Masterplan for NW Cullompton adopted February 2016. Applications for 3 x 200 dwellings (2 Outline, 1 Full) submitted July/August 2017. 17/01170/MOUT (north of Rull Lane - Codex); 17/01178/MFUL (West of Willand Road -Persimmon); 17/01346/MOUT (North of Tiverton Road - PM Asset Management). Decisions pending on each application; anticipate planning committee to consider Summer 2019.	Delivery considered separately for first 600 dwellings (based on three sites subject to separate planning applications) and remaining 750 dwellings. Delivery of second phase (750) reflects requirement for delivery of TCRR and linking road through allocation. HELAA methodology assumptions applied as appropriate. Further detail provided in main report (paras 2.6 - 2.1)	600 dwellings can come forward ahead of TCRR delivery (notwithstanding financial contribution) as per DCC advice. For LPR supply purposes, apply precautionary assumption of TCRR delivery no later than 2023. Delivery of remainder of allocation expected from 2024/25; should therefore not be constrained by TCRR delivery timescales.
East Cullompton	CU7- CU12	1750	0	0	750	Allocation is first phase of Culm Garden village. East Cullompton draft masterplan and vision for wider Garden Village area now complete. Consultation on draft masterplan early 2019 with final version expected autumn 2019. Council is engaging with land promoter (Lightwood Land).	First completions not expected until after initial five year period. Provides a realistic lead in time that is supported by site promoters and reflects Highway Authority advice. Build out follows HELAA methodology assuming multiple development sites; gradual acceleration of delivery up to 200 dwellings per year.	First completions expected in 2023/24, after delivery of TCRR.
Land at Colebrook	CU21	100	0	62	38	19/00118/MOUT. Outline application for 105 dwellings. DCC has withdrawn its previous highways objection and requested removal of requirement in emerging LPR policy CU21 for prior completion of North West Cullompton distributor road (Tiverton Road – Willand Road link). Now proposed for allocation with removal of contingency status.	Follows HELAA market conditions model assumptions.	n/a

Higher Town	SP2	60	0	60	0	17/01359/MOUT. Outline application for 60 dwellings. Anticipate application to be considered by planning committee Summer 2019.	Follows HELAA market conditions model assumptions. As per Inspector's recommendations in the post hearings advice note (ID12), policy tie to J27 development should be removed; site therefore expected to deliver within first five year period.	n/a
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Scenario 1: 'Sedgefield' approach with 20% buffer

Housing requirement

2018/19-2022/23 (Years 1-5)		
A	LPR annual requirement	393
B	Total requirement to date 2013-2018 (A*5)	1965
C	Completions to date 2013-2018 (see trajectory in Appendix 1)	1730
D	Shortfall to date 2013-2018 (B-C)	235
E	5 year requirement 2018-2023 (A*5)	1965
F	5 year requirement with shortfall 2018-2023 (E+D)	2200
G	TOTAL REQUIREMENT 2018-2023 (F)	2200
2023/24-2027/28 (Years 6-10)		
A	LPR annual requirement	393
B	Total requirement to date 2013-2023 (A*10)	3930
C	Completions to date 2013-2023 (see trajectory in Appendix 1)	4531
D	Shortfall to date 2013-2023 (B-C)	-601
E	5 year requirement 2023-2028 (A*5)	1965
F	5 year requirement with shortfall 2023-2028 (E+D)	1364
G	TOTAL REQUIREMENT 2023-2028 (F)	1364
2028/29-2032/33 (Years 11-15)		
A	LPR annual requirement	393
B	Total requirement to date 2013-2028 (A*15)	5895
C	Completions to date 2013-2028 (see trajectory in Appendix 1)	7287
D	Shortfall to date 2013-2028 (B-C)	-1392
E	5 year requirement 2028-2033 (A*5)	1965
F	5 year requirement with shortfall 2028-2033 (E+D)	573
G	TOTAL REQUIREMENT 2028-2033 (F)	573

Five year housing land supply against requirement

		2018/19- 2022/23	2023/24- 2027/28	2028/29- 2032/33
G	Requirement (accounting for shortfall/over-delivery) without buffer	2200	1364	573
H	Requirement (accounting for shortfall/over-delivery) + 20% buffer (G*1.2)	2640	1637	688
I	Housing supply (see trajectory in Appendix 1)	2801	2756	1947
J	5 year land supply without buffer ((I/G)*5)	6.37	10.10	16.99
K	5 year land supply with 20% buffer ((I/H)*5)	5.30	8.42	14.16

Scenario 2: 'Sedgefield' approach with 5% buffer

Housing requirement

2018/19-2022/23 (Years 1-5)		
A	LPR annual requirement	393
B	Total requirement to date 2013-2018 (A*5)	1965
C	Completions to date 2013-2018 (see trajectory in Appendix 1)	1730
D	Shortfall to date 2013-2018 (B-C)	235
E	5 year requirement 2018-2023 (A*5)	1965
F	5 year requirement with shortfall 2018-2023 (E+D)	2200
G	TOTAL REQUIREMENT 2018-2023 (F)	2200
2023/24-2027/28 (Years 6-10)		
A	LPR annual requirement	393
B	Total requirement to date 2013-2023 (A*10)	3930
C	Completions to date 2013-2023 (see trajectory in Appendix 1)	4531
D	Shortfall to date 2013-2023 (B-C)	-601
E	5 year requirement 2023-2028 (A*5)	1965
F	5 year requirement with shortfall 2023-2028 (E+D)	1364
G	TOTAL REQUIREMENT 2023-2028 (F)	1364
2028/29-2032/33 (Years 11-15)		
A	LPR annual requirement	393
B	Total requirement to date 2013-2028 (A*15)	5895
C	Completions to date 2013-2028 (see trajectory in Appendix 1)	7287
D	Shortfall to date 2013-2028 (B-C)	-1392
E	5 year requirement 2028-2033 (A*5)	1965
F	5 year requirement with shortfall 2028-2033 (E+D)	573
G	TOTAL REQUIREMENT 2028-2033 (F)	573

Five year housing land supply against requirement

		2018/19- 2022/23	2023/24- 2027/28	2028/29- 2032/33
G	Requirement (accounting for shortfall/over-delivery) without buffer	2200	1364	573
H	Requirement (accounting for shortfall/over-delivery) + 5% buffer (G*1.05)	2310	1432	602
I	Housing supply (see trajectory in Appendix 1)	2801	2756	1947
J	5 year land supply without buffer ((I/G)*5)	6.37	10.10	16.99
K	5 year land supply with 5% buffer ((I/H)*5)	6.06	9.62	16.18

Scenario 3: 'Liverpool' approach with 20% buffer

Housing requirement

2018/19-2022/23 (Years 1-5)		
A	LPR annual requirement	393
B	Total requirement to date 2013-2018 (A*5)	1965
C	Completions to date 2013-2018 (see trajectory in Appendix 1)	1730
D	Shortfall to date 2013-2018 (B-C) (to be distributed evenly over plan period)	235
E	Shortfall from 2013-2018 to be delivered in 5 year period ((D/15)*5)	78
F	5 year requirement 2018-2023 (A*5)	1965
G	5 year requirement with shortfall 2018-2023 (F+E)	2043
H	TOTAL REQUIREMENT 2018-2023 (G)	2043
2023/24-2027/28 (Years 6-10)		
A	LPR annual requirement	393
B	Shortfall from 2013-2018 to be delivered in 5 year period (see above)	78
C	Total requirement to date 2013-2023 (A*10) + B	4008
D	Completions to date 2013-2023 (see trajectory in Appendix 1)	4531
E	Shortfall to date 2013-2023 (C-D)	-523
F	5 year requirement 2023-2028 (A*5)	1965
G	5 year requirement with shortfall 2023-2028 (F+E)	1442
H	TOTAL REQUIREMENT 2023-2028 (G)	1442
2028/29-2032/33 (Years 11-15)		
A	LPR annual requirement	393
B	Shortfall from 2013-2018 to be delivered in 5 year period (see above)	78
C	Total requirement to date 2013-2028 (A*15) + B	5973
D	Completions to date 2013-2028 (see trajectory in Appendix 1)	7287
E	Shortfall to date 2013-2028 (C-D)	-1314
F	5 year requirement 2028-2033 (A*5)	1965
G	5 year requirement with shortfall 2028-2033 (F+E)	651
H	TOTAL REQUIREMENT 2028-2033 (G)	651

Five year housing land supply against requirement

		2018/19- 2022/23	2023/24- 2027/28	2028/29- 2032/33
H	Requirement (accounting for shortfall/over-delivery) without buffer	2043	1442	651
I	Requirement (accounting for shortfall/over-delivery) + 20% buffer (H*1.2)	2452	1731	782
J	Housing supply (see trajectory in Appendix 1)	2801	2756	1947
K	5 year land supply without buffer ((J/H)*5)	6.85	9.55	14.95
L	5 year land supply with 20% buffer ((J/I)*5)	5.71	7.96	12.46

Scenario 4: 'Liverpool' approach with 5% buffer

Housing requirement

2018/19-2022/23 (Years 1-5)		
A	LPR annual requirement	393
B	Total requirement to date 2013-2018 (A*5)	1965
C	Completions to date 2013-2018 (see trajectory in Appendix 1)	1730
D	Shortfall to date 2013-2018 (B-C) (to be distributed evenly over plan period)	235
E	Shortfall from 2013-2018 to be delivered in 5 year period ((D/15)*5)	78
F	5 year requirement 2018-2023 (A*5)	1965
G	5 year requirement with shortfall 2018-2023 (F+E)	2043
H	TOTAL REQUIREMENT 2018-2023 (G)	2043
2023/24-2027/28 (Years 6-10)		
A	LPR annual requirement	393
B	Shortfall from 2013-2018 to be delivered in 5 year period (see above)	78
C	Total requirement to date 2013-2023 (A*10) + B	4008
D	Completions to date 2013-2023 (see trajectory in Appendix 1)	4531
E	Shortfall to date 2013-2023 (C-D)	-523
F	5 year requirement 2023-2028 (A*5)	1965
G	5 year requirement with shortfall 2023-2028 (F+E)	1442
H	TOTAL REQUIREMENT 2023-2028 (G)	1442
2028/29-2032/33 (Years 11-15)		
A	LPR annual requirement	393
B	Shortfall from 2013-2018 to be delivered in 5 year period (see above)	78
C	Total requirement to date 2013-2028 (A*15) + B	5973
D	Completions to date 2013-2028 (see trajectory in Appendix 1)	7287
E	Shortfall to date 2013-2028 (C-D)	-1314
F	5 year requirement 2028-2033 (A*5)	1965
G	5 year requirement with shortfall 2028-2033 (F+E)	651
H	TOTAL REQUIREMENT 2028-2033 (G)	651

Five year housing land supply against requirement

		2018/19- 2022/23	2023/24- 2027/28	2028/29- 2032/33
H	Requirement (accounting for shortfall/over-delivery) without buffer	2043	1442	651
I	Requirement (accounting for shortfall/over-delivery) + 5% buffer (H*1.05)	2146	1514	684
J	Housing supply (see trajectory in Appendix 1)	2801	2756	1947
K	5 year land supply without buffer ((J/H)*5)	6.85	9.55	14.95
L	5 year land supply with 5% buffer ((J/I)*5)	6.53	9.10	14.23