



# Mid Devon Local Plan Review 2013-33

## Housing Land Supply Update

January 2019

## Contents:

Summary .....	1
Introduction .....	2
Housing Land Supply Evidence and Assumptions.....	3
Five Year Housing Land Supply Calculations.....	20

Appendix 1: Local Plan Review updated housing trajectory

Appendix 2: Local Plan Review housing provision by allocation

Appendix 3: HELAA methodology – build out assumptions for standard and market conditions models

Appendix 4: Status of allocated sites, delivery assumptions and evidence

Appendix 5: Five year housing land supply calculations

## Evidence Base and other documents referenced in this paper:

[Local Plan Review Proposed Submission \(incorporating modifications\) January 2017](#) [SD01]

[Exeter Housing Market Area Strategic Housing Land Availability Assessment SHLAA Methodology 2015](#) [HOU1a]

[Strategic Housing Market Assessment \(SHMA\) 2015](#) [HOU03]

[Exeter Housing Market Area Housing and Economic Land Availability Assessment \(HELAA\) Methodology 2017](#) [HOU09]

[Housing Land Availability \(HLA\) Summary \(2016\)](#) [MID02]

[Housing Land Availability \(HLA\) Summary \(2018\)](#) [MID07]

[Commercial Land Availability \(CLA\) Summary \(2018\)](#) [MID09]

[Adopted Local Plan](#) [LDO01-LDO03]

## Summary

This document:

- 1) Provides an updated housing trajectory which sets out the latest situation in relation to housing supply across the district of Mid Devon (actual and forecast), based on the most up-to-date monitoring data.
- 2) Sets out the key evidence and assumptions used to inform the housing trajectory.
- 3) Considers the implications of anticipated housing delivery for housing supply in the context of the submitted Mid Devon Local Plan Review.
- 4) Sets out that the Local Plan Review provides sufficient housing to meet the housing requirement over the lifetime of the plan (2013-2033) and that a five year housing land supply can be demonstrated, initially and looking forward, based on a variety of approaches and assumptions.
- 5) Given the specific circumstances relating to the supply and delivery of housing in Mid Devon, the most appropriate approach demonstrates 6.4 years of deliverable sites for the initial five year period. This follows the 'Liverpool' approach to dealing with previous shortfall and applies a 5 % buffer to the housing requirement. This approach is appropriate for the Local Plan Review which relies on large strategic sites to deliver a substantial part of the overall housing requirement over the plan period. The calculation following this approach is as follows:
  - Requirement of 2146 dwellings (393 x 5 years plus backlog met over remaining Plan period plus 5%). There are currently 2741 deliverable dwellings (over the next five year period).  $(2741/2146) \times 5 = 6.4$  years supply.
  - Even using the harshest assumptions (20% buffer and meeting the backlog over 5 years), a five year supply can be demonstrated. (See Appendix 5 for detailed calculation).
  - The Council's methodology does not include an allowance for dwellings completed on (as yet unconsented) windfall sites.

## Introduction

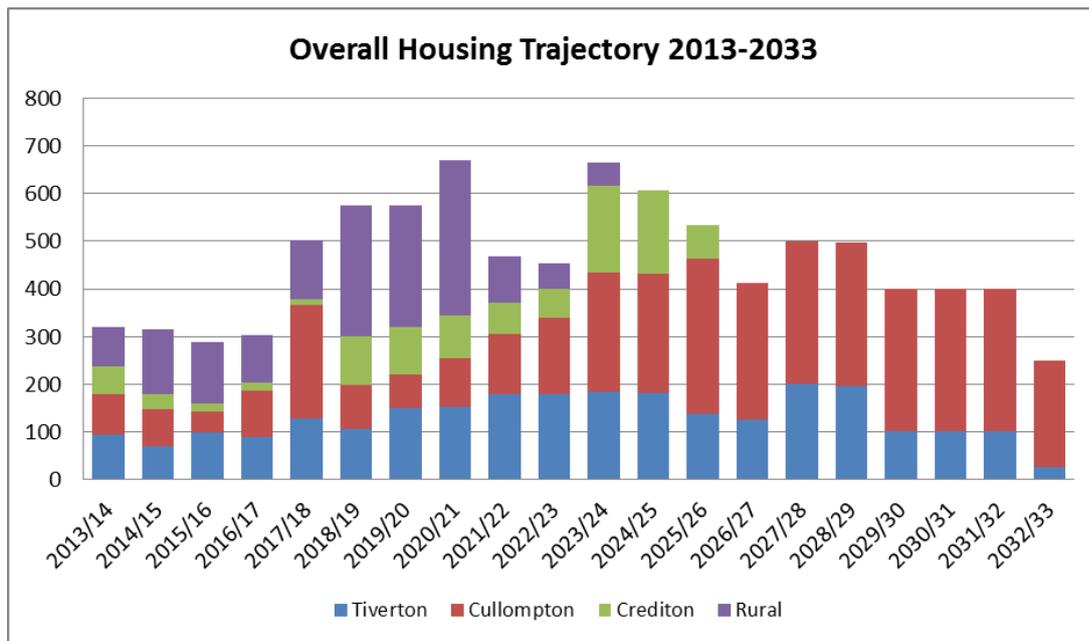
- 1.1 This paper contains the latest evidence and analysis about housing supply in the plan period of the Mid Devon Local Plan Review (2013 -2033) and the calculation of the five year housing land supply. The paper sets out that the Local Plan provides sufficient housing to meet the housing requirement over the lifetime of the plan (2013-2033) and that a five year housing land supply can be demonstrated.
- 1.2 Calculation of five year housing land supply is affected by a number of different assumptions and methods. This paper sets out a range of five year supply scenarios which the Council considers are based on reasonable approaches. These scenarios demonstrate a five year supply against the Local Plan Requirement of between 5.2 and 6.4 years for the next five years of the plan (to 2022/23). In subsequent five year periods it is shown that five year supply is at least 9 years. Even when five year supply calculations are based on the most conservative assumptions, the Local Plan Review is able to demonstrate a supply of specific deliverable sites sufficient to provide five years' worth of housing against housing requirements.

## Housing Land Supply Evidence and Assumptions

### *Latest monitoring data and updated Local Plan Review housing trajectory*

- 2.1 Mid Devon District Council produces annual monitoring data which includes the number of dwellings permitted, commenced and completed on every development site across the district for the period 1 April – 31 March. The Housing Land Availability (HLA) Summary is produced annually which sets out the number of dwellings with permission and under construction ('commitments') as of the 31 March and dwellings completed for the period 1 April – 31 March. The most recent HLA Summary (published August 2018) covers the period 1 April 2017 to 31 March 2018 and has been added to the Local Plan Review Examination Library as Examination Document [MID07]. This updated HLA Summary (2018) supersedes the HLA Summary (2016), submitted to the Inspector in March 2017 as Core Document [MID02]. The HLA Summary (2018) sets out a housing trajectory over the five year period to 2022/23 based on commitments and housing allocations from the currently adopted Local Plan [see LDO01-LDO03].
- 2.2 The monitoring data behind the HLA Summary (2018) provides the baseline data for the updated Local Plan Review (LPR) housing trajectory shown in Appendix 1 of this paper. This provides an updated housing trajectory covering the whole Local Plan Review plan period (2013-2033) which takes account of the proposed Local Plan Review housing allocations. The LPR trajectory identifies the dwellings completed since the start of the plan period (2013) and provides a projection of future dwelling completions based on current commitments (dwellings with permission or under construction at the 31 March 2018) and unconsented allocations. Unconsented allocations in this respect equate to the total number of dwellings proposed for allocation (as per the January 2017 Proposed Submission version of the Local Plan Review [SD01]) with any permissions granted up to 31 March 2018 on these allocations deducted.
- 2.3 Chart 1 below provides a graphical representation of the data included in the trajectory (Appendix 1) based on delivery in each of the main towns and the rural areas. Allocations in Crediton, sites in rural areas and the initial phases of the strategic town allocations in Tiverton and Cullompton support the housing supply for the next five year period (to 2022/23). This allows a sufficient lead-in period for the remaining parts of the strategic town allocations once additional infrastructure and masterplanning requirements have been dealt with. After this lead-in period, delivery rates on the strategic town sites increase from the middle stages of the plan period. The development of allocated sites in Tiverton and Crediton decreases in the latter part of the plan period, while Cullompton's role in meeting long term housing need is reflected in the town's forecast delivery up to 2033.

CHART 1: Housing trajectory by area



2.4 Much of the work that has gone into determining the trajectories for the HLA Summary (2018) has informed the development of the updated LPR housing trajectory in Appendix 1, in particular in relation to the existing commitments. The updated trajectory also considers the anticipated delivery of proposed Local Plan Review allocations not previously identified by the HLA (in addition to the currently adopted Local Plan allocations carried forward as proposed allocations). The totals against each proposed Local Plan allocation shown in the LPR housing trajectory (Appendix 1) identify only the unconsented elements of the allocations. Any dwellings currently with permission or under construction (at 31 March 2018) on proposed allocations or non-allocated ‘windfall’ sites are included in the figures for ‘commitments’ in the LPR housing trajectory. All identified windfalls are included within the commitment figures as no allowance is made in the delivery projections for ‘future’ windfalls. Further discussion of windfall development is provided in paragraphs 2.34-2.38 below. The LPR trajectory presented in Appendix 1 provides the data to inform the supply elements of the five year housing land supply calculations set out below.

2.5 The table in Appendix 2 provides additional detail on the trajectory in Appendix 1, showing the current situation on each site proposed for allocation (at 31 March 2018) in terms of past completions, current commitments (dwellings with permission or under construction) and any remaining unconsented element of the allocation. In addition, a breakdown is provided of the windfall commitments and completions that, along with the proposed allocations, make up the overall housing provision over the plan period (2013-2033). It can be seen that some of the proposed allocations, once commitments are counted, now provide a higher number of dwellings than is identified in the relevant policy of the 2017 Proposed Submission version of the Local Review. In some cases where a small residual element of the proposed allocation now remains after the majority of the site has been granted permission, the remainder has been assumed to be no longer deliverable and as such is excluded from the housing trajectory.

### Site progress since March 2018

- 2.6 As the current annual monitoring year will not end until 31 March 2019, the Council is not at present in a position to publish fully updated monitoring data for the 2018/19 period. However, to supplement the information provided by the most recent HLA Summary (2018), this paper identifies the proposed allocation sites which have had new permissions granted since 31 March 2018 or currently have a resolution to grant permission subject to a Section 106 agreement (these would not be recorded as part of the annual monitoring data). Table 1 below provides an indication of the effect that these new permissions would have on the housing supply figures provided by the Local Plan housing trajectory. Please note, these changes are not reflected in the housing trajectory presented in Appendix 1 of this report which is based on monitoring data as at 31 March 2018 (the end of the most recent fully completed monitoring year). It can be seen that recent approvals on allocated sites would have a minor impact on the trajectory in terms of five year supply, with a more significant boost to supply (+62 units) occurring later in the plan period. Although the anticipated changes to the housing supply position would be relatively minor, the progress made with these sites (e.g. reserved matters approvals) provides additional confidence in the delivery assumptions made on the basis of the March 2018 data.
- 2.7 It should be noted that approvals on windfall sites are not included in Table 1; however the Council is aware that permissions have been granted since March 2018 on a number of sites not proposed for allocation. For example, outline permission was granted in August 2018 for 40 dwellings at Threshers, Crediton (17/01090/MOUT) and a number of additional sites have also been consented. Windfall permissions in the 2018/19 monitoring year would produce a further boost to the housing supply figures on top of those derived from the current monitoring figures (accounting for any lapsed permissions). Such windfall permissions and the permissions granted on allocated sites identified in Table 1 will be picked up in the monitoring data through the next monitoring cycle (April 2018 – March 2019).

**TABLE 1: Allocation site updates - planning permissions granted since 31 March 2018 (as of 9 January 2019)**

Town/village	Allocation and Policy Reference	Application type and Reference	Latest update (as of January 2019)	Change to 5 year supply*	Change to overall trajectory*
Tiverton	Tiverton EUE TIV1 – TIV5	Reserved matters 18/00133/MARM	Approval October 2018; 248 dwellings + 3 Gypsy & Traveller pitches.	No change (HLA and LPR trajectories take account of developer's anticipated delivery rates provided)	No change: RM approval is 79 dwellings short of outline; however Mid Devon expected to deliver approximately 70 on same site with remaining 9 incorporated into the Area B allocation.
Crediton	Pedlerspool CRE5	Outline	Committee approval	No change (build out assumptions)	+ 62 to overall trajectory; would

		17/00348/MOUT	September 2018 (subject to S106 agreement); 257 dwellings + up to 5 Gypsy & Traveller pitches.	stay as per HELAA assumptions - see below for more information).	be delivered outside of first five year period.
Cheriton Fitzpaine	Barnhill Close CF1	Outline 17/01660/MOUT	Recommend for approval October 2018 (subject to S106 agreement); 10 dwellings	+ 3 (three more than proposed allocation)	N/A (all built out within 5 years)
Cheriton Fitzpaine	Land adjacent to school CF2	Reserved matters 18/00705/MARM	Approval May 2018; 28 dwellings + 90 sqm. A1 retail.	No change: HLA and LPR trajectories take account of outline permission; no change to numbers following RM approval.	N/A (all built out within 5 years)
Copplestone	Old Abattoir C01	Reserved matters 18/00936/MARM	Approval November 2018; 40 dwellings	No change: HLA and LPR trajectories take account of outline permission; no change to numbers following RM approval.	N/A (all built out within 5 years)
Silverton	Old Butterleigh Road S11	Full 17/01751/FULL	Approval October 2018; 5 dwellings	- 3 (three fewer than proposed allocation)	N/A (all built out within 5 years)
Silverton	The Garage S12	Full 17/01395/FULL	Approval October 2018; 5 dwellings	No change (as proposed)	N/A (all built out within 5 years)
Thorverton	South of Broadlands TH1	Outline 17/00878/MOUT	Approval August 2018; 16 dwellings	+ 4 (four more than proposed allocation)	N/A (all built out within 5 years)
<b>Total indicative change</b>				<b>+ 4</b>	<b>+62</b>

\*N.B these are indicative changes only against the figures derived from the Local Plan Review housing trajectory presented in Appendix 1 and not reflected in the trajectory itself. Figures in the trajectory are based on monitoring data as at 31 March 2018 (the end of the most recent fully completed monitoring year).

2.8 In addition to the sites listed in Table 1, a number of the proposed allocation sites are the subject of current planning applications: the planning committee list of major applications with no decision (as at the 9 January 2019 Planning Committee<sup>1</sup>) includes applications on allocated sites totalling 689 dwellings. Further detail on the current status of each site proposed as a Local Plan Review allocation, including the progress of current planning applications, is

<sup>1</sup> Planning Committee Wednesday, 9 January, 2019 2.15 pm: agenda reports pack.  
<https://democracy.middevon.gov.uk/ieListDocuments.aspx?CId=132&MId=927&Ver=4>

provided in Appendix 4. The impact that the current status of sites is likely to have on commencement and build out has been assessed; these issues are discussed further below.

### ***Site deliverability***

- 2.9 The NPPF (2012) requires local planning authorities to identify a supply of specific deliverable sites sufficient to provide five years' worth of housing against housing requirements. Paragraph 47 (Footnote 11) of the NPPF states that 'to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years...'. In addition Paragraph 47 of the NPPF requires local planning authorities to identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible for years 11-15.
- 2.10 The 'St Modwen' Court of Appeal decision<sup>2</sup> considered the definition of the 'deliverability' of a site in the context of the NPPF requirements. The court concluded that to be deliverable in this sense, a site should be capable of being delivered within five years, but it does not need to be certain or probable that the site actually will be delivered within five years.
- 2.11 In the context of the above, the Council is confident that a five year supply of deliverable housing sites can be demonstrated and more generally that the sites proposed for allocation can and will deliver sufficient housing to meet Mid Devon's requirements. The sites allocated for housing development in the Local Plan review have been deemed available, suitable and achievable through the Strategic Housing Land Availability Assessment (SHLAA) process. A number of sites proposed as allocations have been granted planning permission since 2013 and as such are considered as 'commitments' within the housing trajectory set out in this paper (Appendix 1). Of the remaining unconsented proposed allocations, the trajectory also includes those sites that meet the NPPF requirement of being deliverable within five years (and as such contribute towards the five year land supply), or are considered developable but expected to contribute to housing supply later in the plan period.

### ***Commencement and build out rates***

- 2.12 The delivery rates for the housing trajectory set out in this paper have been informed by the most recent version of the methodology originally agreed between the councils of the Exeter Housing Market Area and relevant stakeholders as part of the Strategic Housing Land Availability Assessment (SHLAA) process. This is set out in the 2017 Exeter Housing Market Area Housing and Economic Land Availability Assessment (HELAA) Methodology [HOU09] which supersedes the 2015 version of the Exeter Housing Market Area SHLAA Methodology [HOU1a]. In setting assumptions for likely commencement and build out rates on sites for previous five year land supply calculations, the Council has for a number of years used the 'market conditions model' which forms part of the HELAA methodology; this reduces the assumed delivery rate for all dwellings (against a 'standard model' approach) during periods where the HELAA panel and local authority agree market conditions are likely to restrict the ability of

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<sup>2</sup> St Modwen v SSCLG & ERYC [2017] EWCA Civ 1643

developers to build out sites at normal rates. Recent evidence, including annual completion rates on larger sites (see table 2) and the high level of completions across the district in the 17/18 monitoring year (see [MID07]), suggests that the less conservative ‘standard model’ may now be more appropriate; however, as a starting point in considering site delivery for the updated trajectory, the Council has opted to apply caution and continue to use the market conditions model.

**TABLE 2: Recent completions on large Local Plan Review allocations under construction (15 dwellings +)**

Policy Reference/Site	Planning Reference(s)	Commencement	Built 2016/17	Built 2017/18
TIV6 Farleigh Meadows, Tiverton	12/00277/MOUT, 14/01047/MARM. Revised layout: 16/01899/MARM (259 dwellings)	April 2015	57	91
CU13 Knowle Lane, Cullompton	13/00035/MOUT, 15/00650/MARM (266 dwellings). 16/01988/MOUT (74 dwellings)	April 2016	20	113
CU16 Cummings Nursery	13/00859/MOUT, 15/00934/MARM (100 dwellings)	March 2016	40	51

Source: MDDC monitoring database

- 2.13 The HELAA models provide assumptions for the anticipated commencement and build out rates based on the size of sites, whether sites have commenced, have planning permission only or are proposed for allocation but have no current permissions. The basic assumption used by the HELAA models is that sites will come forward at the earliest realistic opportunity, however the Council recognise that delivery will be largely dependent on the housing market and it is possible that sites will be delivered at different times and rates to those forecast. Appendix 3 provides an extract from the HELAA methodology showing the standard and market conditions models.
- 2.14 Of the sites with planning permission or dwellings under construction (considered in the trajectory as ‘commitments’), it has generally been assumed that the HELAA model assumptions will hold true for those that are windfalls or the smaller proposed allocations; the result is that these sites are expected to fully build out within the first five year period. For the larger ‘committed’ allocations, additional research has been carried out to provide a check against the HELAA model assumptions. For certain sites, this work has involved discussions with case officers who have knowledge of the sites and developers’ intentions; in other instances projections of annual dwelling completions have been provided direct from developers. Where this research has brought to light evidence suggesting alternative build out rates are appropriate, the trajectory provided by the HELAA model has been revised accordingly.
- 2.15 A similar exercise has been carried out with the proposed allocations without permission. As would be expected, less information is available regarding developer’s intentions for these sites so the trajectory is more reliant on the HELAA model to set the rates of delivery. Nevertheless, the Council has sought to obtain evidence to support the delivery assumptions. For unconsented allocations, the HELAA model is more cautious, putting back commencements to either year three or four of the subsequent five year period, depending on the size of the site.

The effect of following the HELAA model is that completions on smaller sites will tend to group in year three of the five year period, potentially giving an overinflated anticipated completion figure overall for that year of the plan. In order to present a more realistic pattern of delivery, the Council has attempted to spread the completions from smaller unconsented allocations across the five year period based on the evidence available. In some cases, this results in a more cautious approach than the HELAA model suggests. However, this would not change the basic assumption, reflected in the HELAA model, that the majority of smaller allocations will complete within the five year period.

- 2.16 Commencement and build out in line with the HELAA model assumptions would be consistent with the NPPF (2012) definition of deliverability within five years, as clarified by the ruling in the St Modwen case (see above). Using the agreed HELAA methodology is a realistic approach for the majority of the Local Plan Review unconsented site allocations; indeed an argument could be made that, given previous work undertaken to demonstrate that sites have a realistic prospect of being delivered (e.g. through the SHLAA process), all proposed site allocations in the Local Plan Review are capable of being delivered, or at least starting to deliver, within five years. Notwithstanding this, the Council has applied particular caution in placing the larger unconsented allocations in the overall housing trajectory. The effect of this is that for sites where there are known factors that would likely result in longer lead-in periods than the HELAA model would anticipate, commencement has been put back later in the five year period or outside it altogether. For example, this could be the case where the delivery of a site is dependent on the delivery of major infrastructure (e.g. CU7 East Cullompton) or prior approval on another site (e.g. CRE2 Red Hill Cross).
- 2.17 For unconsented allocations, consideration has been given to those sites that are currently subject to planning applications and the implications this has for the delivery assumptions. It is a reasonable assumption that current planning applications provide evidence of the developer's or promoter's intention to bring a site forward and therefore help provide justification for the delivery assumptions. Typically the anticipated time frame for approval (including reserved matters where applicable) and subsequent commencement would fit in with the HELAA model assumptions. As a general rule, caution has been applied and proposed allocation sites subject to planning applications are treated the same as any other currently unconsented allocations. Alternative assumptions have only been applied where there is strong evidence that the anticipated delivery of an unconsented site will differ from the HELAA model assumption.
- 2.18 Table 3 provides a summary of the basic assumptions used for windfall commitments, consented and unconsented allocations to inform the housing trajectory and five year land supply. For the larger strategic sites, details of the anticipated build out and the evidence to support the assumptions used is provided below. Appendix 4 provides a comprehensive overview on the current status of each proposed allocation site and how this has informed the commencement and build-out assumptions set out in the trajectory (Appendix 1).

**TABLE 3: Summary of typical delivery assumptions**

Type of site	Typical Delivery Assumption
Approved or under construction windfall sites (all sites 30 dwellings or under)	HELAA methodology assumptions apply; delivery within 5 years unless clear evidence to indicate otherwise.
Approved or under construction 'small' allocations (30 dwellings or under)	HELAA methodology assumptions apply; delivery within 5 years unless clear evidence to indicate otherwise.
Approved or under construction 'larger' allocations (over 30 dwellings)	Additional evidence of delivery sought (e.g. developer's trajectory); HELAA methodology assumptions may be amended accordingly (likely to be amended based on new evidence where sites are under construction for at least 2 years)
Unconsented allocated sites	Follow HELAA methodology assumptions for build out in conjunctions with available evidence (e.g. a planning application). Apply caution and move back commencement so delivery is outside/after 5 year period if longer lead in time appropriate.
Unconsented windfall sites	Not counted (no 'windfall allowance' in trajectory) – see discussion on windfalls below.

### ***Strategic allocations***

#### Tiverton Eastern Urban Extension (EUE)

- 2.19 The EUE allocation is divided between Areas 'A' and 'B'. Figure 1 (page 12) provides an overview of the current status and the planning permissions for each area. The whole allocation has been subject to high level masterplanning, with detailed masterplanning complete for Area A.
- 2.20 Area A has outline planning permission for 1030 dwellings on two sites (at 31 March 2018); these are shown by the blue and green outlines in Figure 1. The remainder of the allocation will be accommodated in Area B (at least 550 dwellings).
- 2.21 Since March 2018, a Reserved Matters application has been approved for 248 dwellings and 3 Gypsy and Traveller pitches in Area A (part of the site outlined in green in Figure 1). Developers are now on site (as of January 2019) with formal commencement expected in early 2019. The site is being marketed as 'Braid Park' by Barratt Homes. A build out trajectory provided by the developer has informed the Local Plan Review housing trajectory for this element of the allocation; this indicates that completions are expected to begin in the 2019/20 monitoring year (April 2019 – March 2020). Mid Devon District Council's own housing delivery company ('Three Rivers') is expected to deliver approximately 70 dwellings on the remainder of the site outlined in green in Figure 1. A Reserved Matters application is expected by the summer of 2019; this has informed the expected commencement of this element of the allocation for the housing trajectory (expected first completions from 2020/21).
- 2.22 The remainder of Area A has outline permission (site outlined in blue in Figure 1 - approximately 700 dwellings). Provision has been made for a link road into the site from the newly constructed junction with the A361 (left in/left out slips). The Council understands that discussions with developers are ongoing with Reserved Matters applications expected in 2019.

The build out for the remainder of Area A follows the HELAA market conditions model assumptions (first completions from 2020/21).

2.23 Masterplanning work in relation to Area B is ongoing, the first round of public consultations having taken place in June 2017. Access to Area B is proposed to be via Area A with the link road being implemented at the completion of 470 dwellings on the western part of Area A (site outlined in blue in figure 1). This has informed the potential commencement of the development of Area B for the purposes of the housing trajectory, with build-out following the HELAA market conditions model assumptions. This indicates initial completions in Area B during the 2026/27 monitoring year; delivery of Area B is therefore assumed to be later than the next five years of the plan period. The Local Plan Review and current masterplan assume at least 550 dwellings can be accommodated within Area B, however with detailed masterplanning still to be completed there is flexibility in terms of the final numbers that could be expected in Area B. The Local Plan trajectory has anticipated a small difference between the current outline permissions for Area A (at 31 March 2018) and the reserved matters permissions that have been granted since or are expected in 2019; it has been assumed that this difference can be accommodated within Area B.

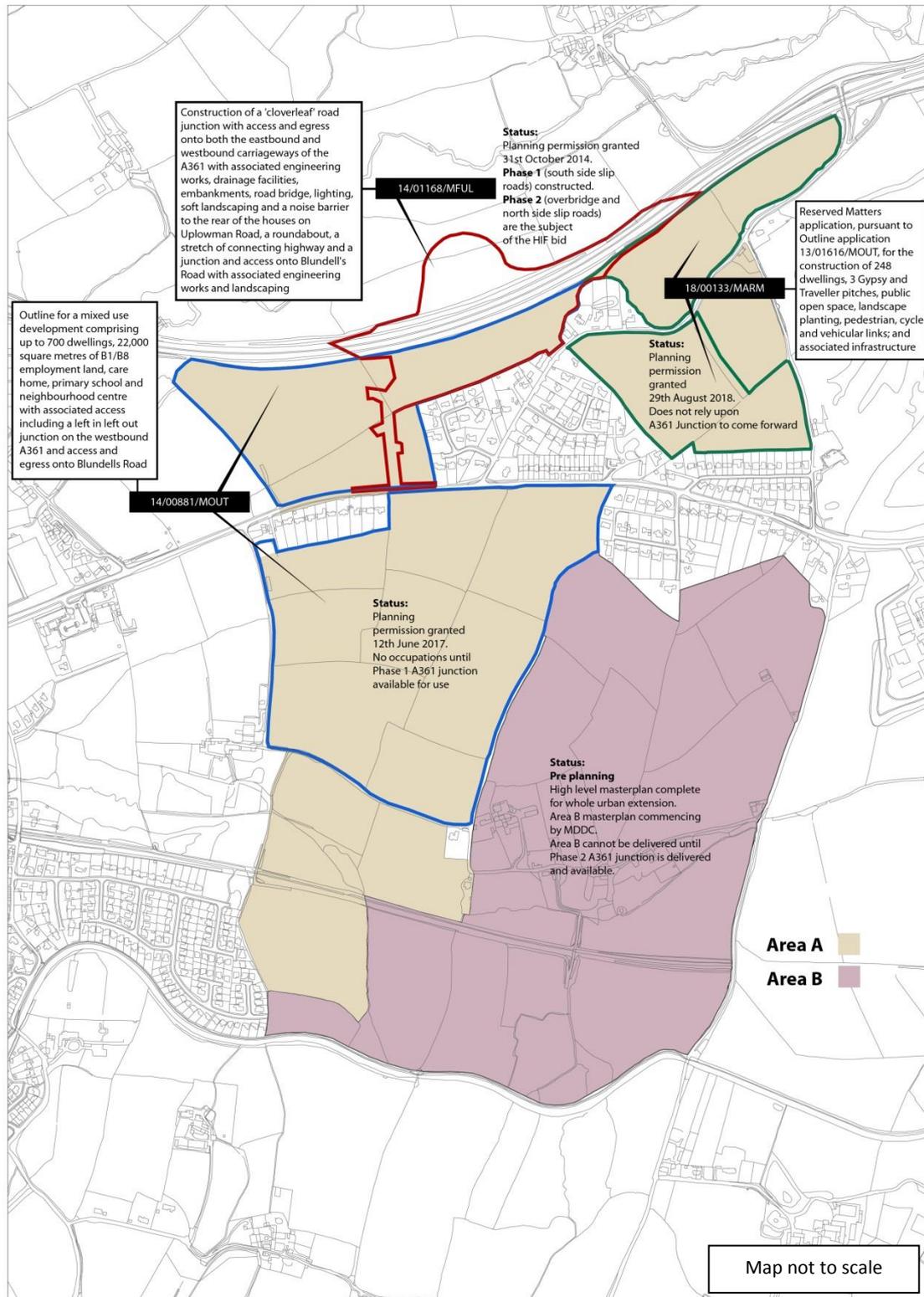
2.24 Table 4 below provides a breakdown of the proposed trajectory for the EUE allocation by each of the elements described above. Further detail on the assumptions applied and the evidence used to determine the anticipated build out of each element of the EUE allocation is provided in Appendix 4.

**TABLE 4: Detail of proposed Tiverton EUE build out**

Location/Policy	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	Notes
<b>EUE TIV1 - TIV5</b>																	
Area A ('Braid Park')		61	64	66	60											<b>251</b>	Outline Permission as of 31 March 2018 (subsequent reserved matters approval - includes provision of 3 G&T pitches).
Area A (MDDC/Three Rivers)			12	25	25	8										<b>70</b>	Outline approval; RM from Three Rivers to follow Spring/Summer 2019.
Area A ('Chettiscombe Trust Land')			12	50	50	100	100	100	100	100	88					<b>700</b>	Outline approval.
Area B											9					<b>9</b>	Extra 9 dwellings in area B to make up for 9 with outline in Area A not expected to come forward for reserved matters.
<i>EUE all commitments</i>		61	88	141	135	108	100	100	100	100	97					<b>1030</b>	Total of above elements
Area B (remaining unconsented allocation)									25	100	100	100	100	100	25	<b>550</b>	Linking road to Area B available at 470 dwellings.
<b>Eastern Urban Extension (Total)</b>	<b>0</b>	<b>61</b>	<b>88</b>	<b>141</b>	<b>135</b>	<b>108</b>	<b>100</b>	<b>100</b>	<b>125</b>	<b>200</b>	<b>197</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>25</b>	<b>1580</b>	

Key	Part of allocation in trajectory commitments	Unconsented part of allocation	Contribution to five year supply
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FIGURE 1: Current planning status and proposed phasing for Tiverton EUE Areas A and B



### North West Cullompton

- 2.25 The North West Cullompton allocation proposes 1350 dwellings of which 600 are currently subject to three separate planning applications. These three applications are on separate sites within the allocation, for 200 dwellings each. As shown in Table 5, each of these sites has been considered individually in terms of the anticipated commencement and build out; this feeds into an overall housing trajectory for the allocation. The trajectory considers the remainder of the allocation separately from these three sites.
- 2.26 Of the three current planning applications, one is for full permission, while the other two are for outline permission only. Although the sites are subject to planning applications which provide clear evidence of developers' intentions to bring the sites forward, caution has been applied for the purposes of the trajectory and the sites are considered as part of an unconsented allocation. The site promoter for the full permission application is a housebuilder (Persimmon) who has indicated their intention to commence development soon after the granting of planning permission and build out at a rate above that assumed by the HELAA market conditions model. The build out used in the trajectory for this element of the allocation therefore follows an increased rate of delivery that aligns with the HELAA standard model for a site without planning permission. This assumption is also broadly in line with the recent delivery rates on larger sites in Mid Devon (see table 2). The two sites subject to outline applications are assumed to build out in accordance with the HELAA market conditions model for sites without planning permission, although for reasons explained previously this provides a relatively conservative estimate of potential build out on these two sites. Based on these assumptions, the three sites currently subject to planning applications would start to see completions from 2020/21.
- 2.27 The delivery of the remainder of the North West Cullompton allocation (750 dwellings) is pushed back to later in plan period (outside the next five year period). This reflects the masterplan requirement for a linking road on occupation of the 500<sup>th</sup> unit to serve the remaining part of the allocation. On the assumption that the 500<sup>th</sup> unit is occupied in 2024/25, completions for the remaining 750 dwellings begin in this year. The build out of this element of the trajectory follows the HELAA model assumptions for a 750 dwelling site. This is a relatively conservative estimate of the likely build out given the potential for the development to come forward as separate sites.
- 2.28 Table 5 below provides a breakdown of the proposed trajectory for the North West Cullompton allocation by the parts of the allocation described above. Further information on the assumptions applied and the evidence used to determine the anticipated build out of each element of the allocation is provided in Appendix 4.

**TABLE 5: Detail of proposed North West Cullompton build out**

Location/Policy	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	Notes
<b>NW Cullompton CU1 - CU6</b>																	
West of Willand Road			25	50	50	50	25									200	Application for Full Planning Permission.
North of Rull Lane			12	25	25	50	50	38								200	Application for Outline Planning Permission.
North of Tiverton Road			12	25	25	50	50	38								200	Application for Outline Planning Permission.
Remainder of allocation							25	100	100	100	100	100	100	100	25	750	Remainder from year 7 to reflect trigger of 500 dwellings for NW Cullompton link road.
<b>NW Cullompton (Total)</b>	<b>0</b>	<b>0</b>	<b>49</b>	<b>100</b>	<b>100</b>	<b>150</b>	<b>150</b>	<b>176</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>25</b>	<b>1350</b>	

<b>Key</b>	Part of allocation subject to planning application (currently unconsented)	Unconsented part of allocation (no application)	Contribution to five year supply
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East Cullompton

- 2.29 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 relief road is expected in summer 2019; the Council is currently working on the assumption that the road will be completed by 2021.
- 2.30 Based on the above, the housing trajectory therefore considers the first 500 dwellings of the allocation separately from the remaining 1250. The resulting trajectory sees a gradual acceleration of delivery across the allocation as a whole. Unlike the Tiverton EUE and North West Cullompton allocations, there are no live or approved planning applications for the East Cullompton allocation which would help inform the trajectory. However, in developing an appropriate trajectory for this allocation, the Council has been in discussion with the land promoters (Lightwood Land) and the Highway Authority.
- 2.31 The trajectory broadly aligns with the HELAA models, although 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. The commencement and build out has been agreed with the land promoters and Highway Authority. Two developers on two separate sites are assumed for the initial phase, reflecting assumptions in the masterplan. Additional developers would be expected to come on board for the later phases and the trajectory assumes two additional developers would support development of the remainder of the allocation. 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.

2.32 Table 6 below provides a breakdown of the proposed trajectory for the East Cullompton allocation. A summary of the assumptions applied to determine the anticipated build out of each element of the allocation is provided in Appendix 4.

**TABLE 6: Detail of proposed East Cullompton build out**

Location/Policy	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	Notes
<b>East Cullompton CU7 - CU12</b>																	
First 500 units					50	100	100	100	100	50						500	Assumes 2 developers.
Remainder of allocation								25	75	150	200	200	200	200	200	1250	Assumes 2 additional developers from 2025/26
<b>East Cullompton (Total)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>50</b>	<b>100</b>	<b>100</b>	<b>125</b>	<b>175</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>1750</b>	

Key      Unconsented part of allocation      Contribution to five year supply

### *Flexibility and contingency*

2.33 To provide flexibility and to deal with uncertainty in a changing housing market, the Local Plan Review makes provision for approximately 16%<sup>3</sup> more housing than is required over the entire plan period (2013-2033). In addition, the Local Plan Review does not include an allowance for windfall completions in its housing trajectory and proposed five year housing land supply calculation (beyond those already included as existing commitments). In addition to the proposed Local Plan Review allocations that are currently subject to planning applications (as identified in Appendix 4), a number of large non-allocated sites are currently going through the planning process which, if approved, would add a significant number of ‘windfall’ dwellings to the commitments in the housing trajectory and five year housing land supply. For example the latest ‘major applications with no decision list’ provided to Mid Devon District Council’s planning committee on 9 January 2019 shows applications totalling over 250 dwellings on windfall sites<sup>4</sup>. An assessment of the potential for windfall developments in Mid Devon is provided in the section below.

2.34 Furthermore the Local Plan Review proposes to allocate two contingency sites for housing: Tidcombe Hall, Tiverton (TIV13) and Colebrook, Cullompton (CU21). 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, the contingency sites will be released to boost housing supply. Contingency sites are used in the currently adopted Local Plan.

### *Windfall Projections*

2.35 Paragraph 48 of the National Planning Policy Framework (2012) states that:

<sup>3</sup> Local Plan housing requirement – 7860; Local Plan provision (updated trajectory 2019) - 9134

<sup>4</sup> Planning Committee Wednesday, 9th January, 2019 2.15 pm: agenda reports pack.

<https://democracy.middevon.gov.uk/ieListDocuments.aspx?CId=132&MId=927&Ver=4>

- 2.36 'Local Planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.'
- 2.37 An allowance for windfall sites beyond those already identified as 'commitments' (with planning permission or under construction) has not been included in the Local Plan Review housing trajectory (Appendix 1). However it is anticipated that historic trends in windfall development will continue over the plan period. The authority's monitoring data demonstrates that windfall sites have consistently formed a significant element of housing completions within the district even through a period of economic recession and therefore there is every reason to expect that they will continue to provide a reliable source of supply. Notwithstanding this, the Council has taken a cautious approach in its five year land supply calculations and not included an allowance for windfall completions. By not including a windfall allowance, there is an added 'buffer' against any shortfall in the projected supply (for example as a result of changes in housing market conditions). However, for the purposes of this paper it was felt it would be helpful to present an estimate of the difference that windfall completions could make to the housing supply, based on historic windfall completions within the district.
- 2.38 Appendix 4 of the Housing and Economic Land Availability Assessment (HELAA) methodology [HOU09] provides the windfall allowance calculation methodology currently used within the calculation of the five year supply set out in the annual HLA summaries. This identifies mean net dwelling completions on windfall sites over the previous five year period, disregarding completions on garden land and sites of more than 20 dwellings. The projected windfall allowance for each year of the housing trajectory is then based on this average annual figure, ensuring that windfalls already counted in the supply (i.e. commitments) are not double counted. Table 6 sets out a breakdown of the latest HELAA windfall allowance calculation.

**TABLE 6: Windfall allowance calculation in accordance with HELAA methodology**

Monitoring Year	(A) Total Windfall Completions	(B) Garden Land	(C) Windfall sites >20 dwellings	Net windfalls for 5 year land supply calculations = (A) – (B) – (C)
2013/14	245	6	125	<b>114</b>
2014/15	223	7	64	<b>152</b>
2015/16	165	11	31	<b>123</b>
2016/17	192	10	71	<b>111</b>
2017/18	262	22	95	<b>145</b>
<b>5 Year Mean (total 2013 – 2018) / 5 :</b>				<b>129</b>

- 2.39 Table 6 demonstrates a projected windfall allowance for Mid Devon of 129 dwellings per year. This is likely to be a conservative estimate as sites over 20 dwellings are not included. Windfalls currently included in the housing trajectory as part of the commitments are projected to be delivered over the first three years of the initial five year period. Therefore, the trajectory does not include the delivery of any windfall completions in years four and five. On this basis, if a

windfall allowance was to be included in the five year supply, it would be logical to add this to the final two years of the five year period, reflecting windfalls not already counted within the trajectory commitments. Using the conservative estimate of annual projected windfalls above this would add 258 dwellings to the five year housing supply (2 x 129 = 258). This is an indicative figure for information only and is not included as part of the five year supply calculations.

### *Uffculme Appeal Decision*

- 2.40 The Inspector's findings following the April 2016 'Uffculme Road, Uffculme' appeal<sup>5</sup> informed the Council's housing trajectory and calculation of five year housing land supply set out in the HLA Summary (2018). It is therefore relevant to consider the implications of this appeal decision for the updated Local Plan Review trajectory and five year land supply.
- 2.41 The Inspector concluded that the SHLAA methodology [HOU1a] (now known as the HELAA methodology [HOU09]) which sets standard commencement dates and build out rates (unless specific information indicates otherwise) represented a reasonable basis on which to make an assessment of housing supply.
- 2.42 The housing requirement was considered on the basis on the Strategic Housing Market Assessment (SHMA) 2015 [HOU03] which has since been used to inform the Local Plan Review. The Inspector considered that for the purposes of the five year land supply calculation, any shortfall in past delivery against the housing requirement should be included in the requirement going forward within the subsequent five year period. This is in accordance with the 'Sedgefield' approach to five year housing land supply calculations. The Inspector concluded that this approach would be consistent with the advice set out in the National Planning Policy Guidance and the objective of the National Planning Policy Framework to boost significantly the supply of housing.
- 2.43 The Inspector also examined historic delivery rates and concluded that the average annual housing completion rates had under-delivered against targets. Therefore there had been a persistent under delivery of housing and a buffer of 20% should be applied to the calculation of five year land supply (as required by the NPPF). The appeal decision concluded that the buffer should be applied to any shortfall as well as the five year requirement. The Inspector acknowledged that the under-delivery reflected the economic position nationally (in the years preceding 2016).
- 2.44 The Council has taken account of the Inspector's findings in its most recent five year land supply calculations (HLA Summary 2018). In developing a suitable approach for the Local Plan Review five year land supply, it is appropriate to consider to what degree the Inspector's findings from 2016 still carry significance. For example, it can be argued that presenting the Local Plan Review five year housing land supply position represents a significantly different scenario to determining housing land supply for a planning appeal relating to an adopted Local Plan (Core Strategy) more than five years old. In addition, the 'Uffculme' appeal decision is now (January 2019) nearly three years old and the housing delivery situation has moved forward since then; for example, as discussed previously (paragraph 2.12), there are indications

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<sup>5</sup> Appeal Ref: APP/Y1138/W/15/3025120 (11 April 2016)

of a recent upturn in housing delivery across Mid-Devon. The Council therefore considers it is prudent to present a range of scenarios for five year land supply that take account a range of assumptions relating to the application of a 'buffer' and how shortfall against past delivery is dealt with. These scenarios will include the approach taken by the Uffculme appeal Inspector described above.

### ***Implications of new National Planning Policy Framework***

- 2.45 The new National Planning Policy Framework (NPPF) was published on 24 July 2018. Paragraph 214 (Annex 1: Implementation) states that the policies in the previous Framework (2012 NPPF) will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019. The Mid Devon Local Plan Review (LPR) was submitted to the Planning Inspectorate on 31 March 2017 and therefore transitional arrangements apply, resulting in the LPR being examined under the 2012 NPPF.
- 2.46 Notwithstanding the transitional arrangements for the current examination of the Local Plan Review, the 2018 NPPF and related updates to Planning Practice Guidance would have implications for the monitoring of housing delivery and the calculation of five year land supply going forward with an adopted Local Plan. Therefore, although changes introduced by the new NPPF do not have a direct bearing on the five year land supply calculations set out in this paper, the Council would be required to take account of these changes in the future. The Council has assessed the implications of these changes, which include a revised approach to how the deliverability of sites should be evidenced, and judged that they would not affect its ability to demonstrate a five year housing land supply going forward.
- 2.47 The new NPPF introduces a Housing Delivery Test which came into effect in November 2018. This assesses housing delivery within the Local Plan area against the housing requirement. Where there has been significant under delivery of housing over the previous three year period, the NPPF (2018) requires a 20% buffer to be applied to the calculation of five year housing land supply. The NPPF (2018) stipulates that 'significant under delivery' occurs where the Housing Delivery Test indicates that delivery over the previous three years is below 85% of the housing requirement. This replaces the previous subjective interpretation of 'persistent under delivery' in order to assess whether a 20% buffer should be applied (as in the case of the Uffculme Appeal). The Housing Delivery Test results have not yet (as of 14 January 2019) been released; however, the published calculation methodology<sup>6</sup> requires current delivery to be assessed against household projections<sup>7</sup>. Total housing completions over the past three years (as per Mid Devon's monitoring data [MID07]) are in excess of the housing requirement based

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<sup>6</sup> Housing Delivery Test Measurement Rule Book:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728523/HDT\\_Measurement\\_Rule\\_Book.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf)

<sup>7</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections>

As per HDT measurement rule book, for 2017/18 use 2014-based household projections (285 dwellings); for 2015/16 and 2016/17 use 2012-based household projections (307 and 306 dwellings respectively) =898 dwellings over three years.

on household projections<sup>8</sup>. This suggests that, based on anticipated Housing Delivery Test results, there has not been significant under delivery of housing over the past three years.

- 2.48 Updated Planning Practice Guidance has been published following the 2018 NPPF. This explains how provision of care facilities now forms part of the assessment of overall housing delivery: 'local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement.' C2 'commitments' are currently identified as part of the Council's employment land monitoring data and do not contribute to the housing 'commitments' identified as part of the HLA or updated LPR trajectories. As of 31 March 2018, the Commercial Land Availability (CLA) Summary (2018) [MID09] recorded planning approvals for C2 uses in Mid Devon totalling in excess of 10,000 square metres of floorspace. Once implemented, there is potential for these developments to count towards housing completions<sup>9</sup> that would not be currently included as part of the annual housing monitoring data (HLA Summary).

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<sup>8</sup> Dwelling completions as per monitoring data: 502 (17/18), 304 (16/17), 288 (14/16) = 1094 dwellings over three years

<sup>9</sup> On the basis of 1 dwelling per self-contained residential unit; an appropriate ratio is applied to bedrooms in communal establishments.

## Five Year Housing Land Supply Calculations

3.1 Mid Devon District Council has calculated five year housing land supply based on four scenarios. These calculations demonstrate that, allowing for a range of approaches and assumptions, the Local Plan Review provides a five year supply of deliverable sites for housing development. The scenarios considered are as follows:

1) 'Sedgefield' approach (shortfall delivered over the initial 5 year period) with 20% buffer. This scenario applies the most conservative assumptions and follows the approach set out in the proposed submission version of the Local Plan Review in line with the findings of the 'Uffculme' appeal.

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. The Council considers this to be the most appropriate scenario given the specific context of housing supply and delivery in Mid Devon. Further detail is provided below (paragraphs 3.4 – 3.11).

3.2 All scenarios above apply the following conservative assumptions:

- As discussed above, build out rates in the housing trajectory are conservative estimates, based on the 'market conditions' model set out in the HELAA methodology, unless other evidence is available. The supply figure derived from the trajectory is therefore a conservative estimate used in all scenarios.
- A windfall allowance is not included as part of the housing supply calculation.
- The additional housing requirement arising from the commercial Junction 27 proposal is spread across the plan period. Therefore, even though delivery of the Junction 27 proposal is expected later in the plan period, a proportion of the need arising from this proposal is expected to be met within the next five years of the Plan.
- An appropriate buffer has been applied to the shortfall as well as the housing requirement. The Council is aware that some calculations only apply a buffer to the main requirement and not the shortfall and therefore applying the buffer to the shortfall provides a more cautious approach.

3.3 The different approaches and assumptions used in each of the scenarios (1) – (4) above are explained further below.

### *'Sedgefield' and 'Liverpool' approaches*

3.4 The Sedgefield method of calculating land supply involves adding any shortfall of housing in the local plan from previous years over the next five years of the plan period. Planning Practice

Guidance from 2014<sup>10</sup> recommended that local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period ‘where possible’.

- 3.5 An alternative approach is the ‘Liverpool’ method in which the past undersupply of housing is spread equally across the remainder of the plan period. This can help ensure that provision of a five year housing land supply is consistent throughout the duration of the plan period. The Liverpool model is a recognised way of calculating housing supply and has been viewed in a number of cases as a reasonable basis for assessing future supply<sup>11</sup>, particularly where a large proportion of a Local Plan’s planned delivery is on strategic urban extensions (SUEs). The approach is also supported by the Planning Inspectorate through planning appeals (e.g. Colden Common, Hampshire in January 2017)<sup>12</sup>. In the case of the Mid Devon Local Plan Review, SUEs make up over 65% of the planned delivery. Due to their size and complexity SUEs can take longer than smaller sites to start delivering new housing. However, each of the SUEs identified in the Mid Devon Local Plan Review are capable of delivering housing within the plan period.
- 3.6 The Planning Practice Guidance (3-044-20180913) indicates that the use of the Liverpool method must be fixed at the Local Plan examination stage. Given the high proportion of long term housing provision planned for the district through strategic urban extensions, the Liverpool method is the most appropriate approach to use when calculating the five year housing land supply (Scenarios 3 and 4 above). Nevertheless, the Council has also included scenarios which follow the Sedgefield approach to demonstrate that, even when shortfall is delivered within the initial five years, a five year housing land supply can still be achieved.

### ***5% and 20% Buffer***

- 3.7 Paragraph 47 of the NPPF (2012) requires local planning authorities to identify the five year housing supply ‘with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land’. In cases where there has been ‘a record of persistent under delivery of housing’ the buffer should be increased to 20% (also moved forward from later in the plan period) to ‘provide a realistic prospect of achieving the planned supply’ in addition to ensuring choice and competition in the market.
- 3.8 Following the ‘Uffculme Road, Uffculme’ appeal decision (April 2016), the Council has previously worked on the assumption that it is appropriate to apply a 20% buffer to its calculations of five year land supply (see section on Uffculme appeal above, paragraphs 2.39 – 2.43). However the decision on which this assumption is based is nearly three years old and it is questionable whether the reasons for applying this buffer are still applicable. For example, the expected results of the Housing Delivery Test (HDT) (delivery in excess of the identified need over the previous three years) would suggest that there has not recently been ‘significant under delivery’ of housing in Mid Devon. Although it is recognised that the 2018 NPPF, which has given rise to the HDT, is not a consideration for the purposes of this examination, it is argued that the anticipated HDT result still provides a useful reference when considering recent

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<sup>10</sup> <https://webarchive.nationalarchives.gov.uk/20180310204942/https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

<sup>11</sup> Examples include South Cambridgeshire Local Plan (Inspector’s Report August 2018); Central Lincolnshire Local Plan (Inspector’s Report April 2017); Canterbury District Local Plan (Inspector’s Report June 2017).

<sup>12</sup> [https://cornerstonebarristers.com/cmsAdmin/uploads/appeal-decisions-3141664-3141667-\(2\).pdf](https://cornerstonebarristers.com/cmsAdmin/uploads/appeal-decisions-3141664-3141667-(2).pdf)

housing delivery in Mid Devon. Notwithstanding the results of the HDT, it is clear that in the context of housing delivery in Mid Devon, things have moved forward since the Inspector's decision in April 2016. The Inspector recognised the impact of economic factors on the housing delivery situation in Mid Devon at the time; however the recent upturn in housing delivery suggests that market conditions may now not be such a constraint on delivery. In any case, the St Modwen Court of Appeal decision (see above) indicates that local planning authorities should not be penalised if under-delivery was due to wider market conditions where the LPA had made a supply of sites available that had a realistic prospect of delivery.

- 3.9 As such, the Council considers it most appropriate to apply a 5% buffer (scenarios 2 and 4); 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 are also presented.

### ***Summary of Results***

- 3.10 Full detail on the calculation of five year housing land supply (including indicative supply figures beyond the initial five year period) for scenarios 1- 4 above is set out in Appendix 5. The results from each five year land supply scenario for the initial five year period are summarised below.
- 1) 'Sedgefield' approach with 20% buffer: 5.19 years' supply
  - 2) 'Sedgefield' approach with 5% buffer: 5.93 years' supply
  - 3) 'Liverpool' approach with 20% buffer: 5.59 years' supply
  - 4) 'Liverpool' approach with 5% buffer: 6.39 years' supply
- 3.11 In subsequent five year periods, the calculations set out in Appendix 5 show that five year supply is at least 9.04 years.
- 3.12 Based on the most appropriate approach in the context of Mid Devon's planned housing supply and historic delivery, the Local Plan Review can demonstrate a five year housing land supply of 6.39 years (for the initial five year period). Using more conservative assumptions, a five year land supply can still be achieved.

# **APPENDIX 1: LOCAL PLAN REVIEW UPDATED HOUSING TRAJECTORY**

Local Plan Review Housing Trajectory

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
<b>Tiverton</b>																						
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
<b>Cullompton</b>																						
NW Cullompton	CU1-CU6							49	100	100	150	150	176	100	100	100	100	100	100	25		1350
East Cullompton	CU7-CU12									50	100	100	125	175	200	200	200	200	200	200		1750
Ware Park and Footlands	CU14												25	13								38
Colebrook (contingency)	CU21																					0
Commitments							91	71	53	25	12											252
Completions		87	78	44	98	238																545
Cullompton Total		87	78	44	98	238	91	71	102	125	162	250	250	326	288	300	300	300	300	300	225	3935
<b>Crediton</b>																						
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
<b>Rural sites</b>																						
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	48											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	327	99	54	48	0	0	0	0	0	0	0	0	0	1627
<b>Total (Mid Devon - all areas)</b>		320	316	288	304	502	574	574	671	469	453	664	606	533	413	500	497	400	400	400	250	<b>9134</b>
<b>Five year totals</b>				1730			2741						2716					1947				
<b>Cumulative five year totals</b>				1730			4471						7187					9134				

## **APPENDIX 2: LOCAL PLAN REVIEW HOUSING PROVISION BY ALLOCATION**

Local Plan Review housing provision by allocation

Location/Site	Policy	Total dwellings proposed for allocation*	Completions (April 2013 - March 2018)	Dwellings under construction (as at 31st March 2018)	Dwellings with permission only (as at 31st March 2018)	Total Commitments (as at 31st March 2018)	Total current commitments + completions since April 2013	Remaining unconsented allocations	Total anticipated completions within next five years (2018/19 - 2022/23)	Total anticipated completions over remainder of plan period (2023/24 - 2032/33)	Total Local Plan Provision (2013 - 2033)	Difference between proposed allocation total and anticipated LPR provision**
<b>Tiverton</b>												
Eastern Urban Extension	TIV1-TIV5	1580	0	0	1030	1030	1030	550	425	1155	1580	0
Farleigh Meadows	TIV6	255	160	47	52	99	259	0	99	0	259	4
Town Hall/St Andrew Street	TIV7	59	14	0	39	39	53	6	39	0	53	-6
Moorhayes Park	TIV8	8	4	0	0	0	4	4	0	0	4	-4
Howden Court	TIV9	10	0	0	0	0	0	10	10	0	10	0
Roundhill	TIV10	20	0	0	0	0	0	20	20	0	20	0
Palmerston Park	TIV11	25	0	23	3	26	26	0	26	0	26	1
Phoenix Lane	TIV12	60	0	0	0	0	0	60	4	56	60	0
Tidcombe Hall (CONTINGENCY SITE)	TIV13	0	0	0	0	0	0	0	0	0	0	0
Blundell's School	TIV16	200	0	0	0	0	0	200	62	138	200	0
<i>Tiverton Allocations</i>		2217	178	70	1124	1194	1372	850	685	1349	2212	-5
<i>Tiverton Windfalls</i>		0	300	32	49	81	381	n/a	81	0	381	
<i>Tiverton Total</i>		2217	478	102	1173	1275	1753	850	766	1349	2593	
<b>Cullompton</b>												
North West Cullompton	CU1-CU6	1350	0	0	0	0	0	1350	249	1101	1350	0
East Cullompton	CU7-CU12	1750	0	0	0	0	0	1750	50	1700	1750	0
Knowle Lane	CU13	296	133	59	148	207	340	0	207	0	340	44
Ware Park and Footlands	CU14	38	0	0	0	0	0	38	0	38	38	0
Land at Exeter Road	CU15	24	24	0	0	0	24	0	0	0	24	0
Cummings Nursey	CU16	100	91	9	0	9	100	0	9	0	100	0
Land at Colebrook (CONTINGENCY SITE)	CU21	0	0	0	0	0	0	0	0	0	0	0
<i>Cullompton Allocations</i>		3558	248	68	148	216	464	3138	515	2839	3602	44
<i>Cullompton Windfalls</i>		0	297	9	27	36	333	n/a	36	0	333	
<i>Cullompton Total</i>		3558	545	77	175	252	797	3138	551	2839	3935	
<b>Crediton</b>												
Wellparks	CRE1	185	0	37	148	185	185	0	185	0	185	0
Red Hill Cross	CRE2	135	0	0	0	0	0	135	12	123	135	0
Cromwells Meadow	CRE3	35	0	0	49	49	49	0	49	0	49	14
The Woods Group	CRE4	8	0	0	0	0	0	8	0	8	8	0
Pedlerspool	CRE5	200	0	0	0	0	0	200	62	138	200	0
Sports Fields	CRE6	120	0	0	0	0	0	120	12	108	120	0
Stonewall Lane	CRE7	50	0	0	0	0	0	50	0	50	50	0
Land at Barn Park	CRE8	20	0	0	0	0	0	20	20	0	20	0
Land off Alexandra Close	CRE9	15	0	0	0	0	0	15	15	0	15	0
<i>Crediton Allocations</i>		768	0	37	197	234	234	548	355	427	782	14
<i>Crediton Windfalls</i>		0	136	29	32	61	197	n/a	61	0	197	
<i>Crediton Total</i>		768	136	66	229	295	431	548	416	427	979	

Location/Site	Policy	Total dwellings proposed for allocation*	Completions (April 2013 - March 2018)	Dwellings under construction (as at 31st March 2018)	Dwellings with permission only (as at 31st March 2018)	Total Commitments (as at 31st March 2018)	Total current commitments + completions since April 2013	Remaining unconsented allocations	Total anticipated completions within next five years (2018/19 - 2022/23)	Total anticipated completions over remainder of plan period (2023/24 - 2032/33)	Total Local Plan Provision (2013 - 2033)	Difference between proposed allocation total and anticipated LPR provision**
<b>Rural Sites</b>												
Newton Square	BA1	5	0	0	0	0	0	5	5	0	5	0
Stone Crushing Works (Scott's Quarry)	BA2	18	0	6	12	18	18	0	18	0	18	0
Ashleigh Park	BA3	7	3	0	0	0	3	4	0	0	3	-4
School Close	BA4	26	0	0	26	26	26	0	26	0	26	0
Hollywell	BO1	20	0	0	0	0	0	20	20	0	20	0
West of Godfreys Gardens	BO2	6	6	0	0	0	6	0	0	0	6	0
Hele Road	BR1	7	0	0	0	0	0	7	7	0	7	0
Barton	CH1	20	0	0	0	0	0	20	20	0	20	0
Land off Church Lane	CB1	20	0	0	0	0	0	20	20	0	20	0
Barnshill Close	CF1	7	0	0	0	0	0	7	7	0	7	0
Land adjacent to school	CF2	22	0	0	28	28	28	0	28	0	28	6
Old Abattoir	CO1	30	0	0	40	40	40	0	40	0	40	10
Linhay Close	CL1	6	0	0	0	0	0	6	6	0	6	0
Hunter's Hill	CL2	10	3	0	10	10	13	0	10	0	13	3
Land adjacent to Fishers Way	HA1	10	0	0	0	0	0	10	10	0	10	0
Greenaway	MO1	20	0	0	0	0	0	20	20	0	20	0
Court Orchard	NE1	25	0	14	11	25	25	0	25	0	25	0
Former Tiverton Parkway Hotel	SP1	10	0	0	0	0	0	10	10	0	10	0
Higher Town	SP2	60	0	0	0	0	0	60	12	48	60	0
Fanny's Lane	SA1	27	19	0	0	0	19	8	8	0	27	0
Old Butterleigh Road	SI1	8	0	0	0	0	0	8	8	0	8	0
The Garage	SI2	5	0	0	0	0	0	5	5	0	5	0
South of Broadlands	TH1	12	0	0	0	0	0	12	12	0	12	0
West of Uffculme	UF1	60	0	0	60	60	60	0	60	0	60	0
Land East of M5	WI1	42	0	0	0	0	0	42	42	0	42	0
<i>Rural Allocations</i>		483	31	20	187	207	238	264	419	48	498	15
<i>Rural Windfalls</i>		0	540	206	383	589	1129	n/a	589	0	1129	
<i>Rural Total</i>		483	571	226	570	796	1367	264	1008	48	1627	
<b>Total Allocations</b>		7026	457	195	1656	1851	2308	4800	1974	4663	7094	68
<b>Total Windfalls</b>		0	1273	276	491	767	2040	n/a	767	0	2040	
<b>GRAND TOTAL</b>		7026	1730	471	2147	2618	4348	4800	2741	4663	9134	

\* As set out under the relevant policy the Local Plan Review 2013-2033 Proposed Submission (incorporating proposed modifications) January 2017.

\*\* Where existing commitments are higher than proposed allocation or residual element is not expected to be delivered. For further information, please refer to Appendix 3.

**APPENDIX 3: HELAA METHODOLOGY – BUILD OUT  
ASSUMPTIONS FOR STANDARD AND MARKET CONDITIONS  
MODELS**

### Appendix 1: Standard model for calculating housing delivery rates

Size of site (no. of dwellings)	Commencement of sites			Build out rate
	Sites where dwellings are under construction	Sites where dwellings have planning permission	Suitable sites without planning permission	
<b>1-15 dwellings</b> (assumes one developer)	Commence in Year 1	Commence in Year 1	Commence in Year 3	1 <sup>st</sup> year - 25 dwellings maximum 2 <sup>nd</sup> year onward - 50 dwellings per year maximum
<b>16-500 dwellings</b> (assumes one developer)	Commence in Year 1	Commence in Year 2	Commence in Year 3	1 <sup>st</sup> year - 25 dwellings maximum 2 <sup>nd</sup> year onward - 50 dwellings per year maximum
<b>501-1000 dwellings</b> (assumes two developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 <sup>st</sup> year - 25 dwellings maximum 2 <sup>nd</sup> year onward - 100 dwellings per year maximum
<b>1001+ dwellings</b> (assumes three developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 <sup>st</sup> year - 25 dwellings maximum 2 <sup>nd</sup> year onward - 150 dwellings per year

**NB.** These figures provide a general guideline. Different commencement dates or build out rates may be chosen for selected sites by the HELAA panel if warranted due to site specific issues, or if landowners have identified sites as being available at a later date.

## Appendix 2: Market conditions model for calculating housing delivery rates

Size of site (no. of dwellings)	Commencement of sites			Build out rate	
	Sites where dwellings are under construction	Sites where dwellings have planning permission	Suitable sites without planning permission	Years 1-5	Years 6+
<b>1-15 dwellings</b> (assumes one developer)	Commence in Year 1	Commence in Year 1	Commence in Year 3	1 <sup>st</sup> year - 12 dwellings maximum 2 <sup>nd</sup> year onward - 25 dwellings per year maximum	1 <sup>st</sup> year - 25 dwellings maximum 2 <sup>nd</sup> year onward - 50 dwellings per year maximum
<b>16-500 dwellings</b> (assumes one developer)	Commence in Year 1	Commence in Year 2	Commence in Year 3	1 <sup>st</sup> year - 12 dwellings maximum 2 <sup>nd</sup> year onward - 25 dwellings per year maximum	1 <sup>st</sup> year - 25 dwellings maximum 2 <sup>nd</sup> year onward - 50 dwellings per year maximum
<b>501-1000 dwellings</b> (assumes two developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 <sup>st</sup> year - 12 dwellings maximum 2 <sup>nd</sup> year onward - 50 dwellings per year maximum	1 <sup>st</sup> year - 25 dwellings maximum 2 <sup>nd</sup> year onward - 100 dwellings per year maximum
<b>1001+ dwellings</b> (assumes three developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 <sup>st</sup> year - 12 dwellings maximum 2 <sup>nd</sup> year onward - 75 dwellings per year	1 <sup>st</sup> year - 25 dwellings maximum 2 <sup>nd</sup> year onward - 150 dwellings per year

**NB.** These figures provide a general guideline. Different commencement dates or build out rates may be chosen for selected sites by the HELAA panel if warranted due to site specific issues, or if landowners have identified sites as being available at a later date.

## **APPENDIX 4: STATUS OF ALLOCATED SITES, DELIVERY ASSUMPTIONS AND EVIDENCE**

**Local Plan Review Proposed Allocated Housing Sites: Site Status (as of 14 January 2019) and Delivery Assumptions**

*Sites highlighted in light blue indicate planning permissions/ under construction at 31st March 2018. Darker blue indicates site fully built out.*

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). <i>Approvals outside monitoring year shown in red</i>	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
Eastern Urban Extension	TIV1-TIV5	1580 (at least 5 G&T pitches)	<b>AREA A</b> (east) - 'Waddeton Park land'/'Braid Park': Outline (whole site) 13/01616/MOUT & Reserved Matters (covering part of area) 18/00133/MARM	Outline approval September 2015: 330 dwellings, includes signed S106. <i>RM approval October 2018: 248d + 3 G&amp;T pitches.</i>	330	No change to overall allocation total (Area A + B). RM approval is for 251 units. Of 79 remaining from outline, MDDC/3 Rivers expected to deliver 70 units, leaving a reduction of 9; potential for this to be accommodated within Area B.	Barratt Homes.	Developer (Barratt Homes) has provided delivery trajectory for 248 dwellings approved with reserved matters: anticipate occupations from 2019/20 with completions of approximately 60 per year. To complete by 2022/23 (within five year period). Delivery of G&T pitches anticipated within 5 years.  RM application for majority of remaining outline permission anticipated summer 2019 (MDDC/Three Rivers delivery). Although site has outline, applied caution so build out follows HELAA assumptions for unconsented site: completions from year 3 (2020/21), built out by 2023/24.	Not dependent on A361 junction. Braid Park site marketed on Barratt's website: 'launching this winter' (2019)

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). <i>Approvals outside monitoring year shown in red</i>	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
			<b>AREA A</b> (west) – ‘Chettiscombe Trust land’: Outline 14/00881/MOUT	Outline approval June 2017: 700 dwellings, includes signed S106	700	No change to overall allocation total (Area A + B).	Chettiscombe Trust.	Build out follows HELAA assumptions for large site with outline approval; completions from 2020/21, built out by 2028/29. The Council understands discussions between potential developers and the site promoters are ongoing with Reserved Matters application(s) expected in 2019.	Outline permission includes signed S106 agreement. Development on eastern part of site expected to commence imminently (see above). First phase of A361 junction (left in/left out) completed summer 2018. Developer funded link road to junction required prior to occupations.
			<b>AREA B</b> (approx. 550 units - TBC). No application.	n/a	0	Flexibility in allocation to enable 9 dwellings ‘lost’ between Outline and Reserved Matters approvals for Area A (see above) to be accommodated within Area B.	Various	Linking road between Area B and Area A available at 470 dwellings (on Chettiscombe land); therefore anticipate 2026/27 start with build out following HELAA assumptions. Full completion anticipated 2032/33.	Area B Masterplanning underway; stage 1 consultation summer 2017.

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). <i>Approvals outside monitoring year shown in red</i>	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
Farleigh Meadows	TIV6	255	12/00277/MOUT, 14/01047/MARM. Revised layout 16/01899/MARM	Initial RM approval 2015: 255 dwellings.	99	RM approval for revised layout 2016: +4 units = 259 dwellings	Taylor Wimpey	Commencement on site April 2015: 160 completions, 47 under construction, 52 with approval (not started) as of 31 March 2018. Phasing plan and build out trajectory provided by developer. Anticipate site fully built out 2019/20.	
Town Hall / St. Andrew Street	TIV7	59	17/01509/MFUL (revised application September 2017).	Approval December 2017: 39 dwellings	39	Previous application for 44 retirement apartments superseded by application for 39 units. Current commitments and previous completions reduce total plan provision to 53.	MDDC (Three Rivers)	Part of site completed (14 units on St Andrews Street). Contractors on site to rear (39 flats) summer 2018. Build out follows HELAA assumptions: completions from 2019/20, site built out 2021/22.	
Moorhayes Park	TIV8	8	15/00996/FULL	Approval August 2015: 4 dwellings (revised scheme)	0	4 fewer units than allocation; remainder of allocation assumed not deliverable.	Stevens Homes Ltd	4 units completed March 2018.	
Howden Court	TIV9	10	No		0		MDDC (Three Rivers)	Small allocation, considered potentially deliverable in line with HELAA assumptions. Put back delivery to 2023 in line with update from MDDC housing officer.	Council owned site.

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). Approvals outside monitoring year shown in red	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
Roundhill	TIV10	20	No		0		MDDC (Three Rivers)	Small allocation, considered potentially deliverable in line with HELAA assumptions. Put back delivery to 2023 in line with update from MDDC housing officer.	Council owned site.
Palmerston Park	TIV11	25	15/00779/MFUL	Approval July 2015: 26 dwellings	26	+1 dwelling more than allocation	MDDC (Three Rivers)	Commenced June 2017; 23 of 26 plots under construction as of March 2018. Follows HELAA assumptions for site under construction; anticipate completion 2019/20.	Council owned site.
Phoenix Lane	TIV12	60	No		0		Various. MDDC own large parts of site.	Town Centre Regeneration Masterplan Stage 1 options public consultation April/May 2018. Anticipate draft masterplan to cabinet early 2019. Planning application for 4 units submitted late 2018. As per MDDC housing update, remaining units still subject to viability work so put outside 5 years. Build out from this point follows HELAA assumptions; completion by 2024/25.	Subject to masterplan as part of Town Centre regeneration programme.
Tidcombe Hall (contingency)	TIV13	0	No		0			Contingency site so does not form part of Local Plan Review trajectory.	

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). Approvals outside monitoring year shown in red	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
Blundell's School	TIV16	200	No		0		Blundells (c/o GVA) and Russell Toghill (c/o XL Planning)	Build out follows HELAA assumption for unconsented allocation. Completions from 2020/21, site built out by 2025/26.	Recent consolidation of land into two ownerships, both willing to bring forward site (confirmed at September 2018 preliminary hearings). EA supportive of site due to flood alleviation benefits.

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). <i>Approvals outside monitoring year shown in red</i>	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
NW Cullompton	CU1-CU6	1350 (at least 5 G&T pitches)	Applications for 3 x 200 dwellings (2 outline, 1 Full) submitted July/August 2017. 17/01170/MOUT (north of Rull Lane/Codex Land), 17/01178/MFUL (west of Willand Road/Persimmon land), 17/01346/MOUT (North of Tiverton Road/ PM Asset Management Land)	Decisions pending on each application (as of January 2019)	0		Codex, Persimmon Homes, PM Asset Management.	Delivery considered separately for (1) first 600 dwellings (based on three sites subject to separate planning applications) and (2) remaining 750 dwellings. (1) Build out on two sites with outline permissions pending follows HELAA assumptions for unconsented sites of 200 dwellings: completions from year three, both sites built out by 2026/26. Build out for Persimmon site follows HELAA assumptions on commencement with increased rate of build out (in line with HELAA standard model). This reflects developer intention for quick delivery of site (application is full not outline). (2) Remainder of allocation pushed back to later in plan period; build out follows HELAA assumption for 750 dwelling site. Reflects need for linking road to serve remaining units; this is required to be complete by occupation of 500th unit (as per masterplan). Allocation fully built out by 2032/33.	G&T provision proposed as part of remainder of allocation (not current applications)

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). <i>Approvals outside monitoring year shown in red</i>	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
East Cullompton	CU7-CU12	1750 (at least 10 G&T pitches)	No		0		Lightwood Land	First 500 units can come forward once Cullompton relief road implemented. Delivery therefore considered separately for (1) first 500 units, (2) remainder of allocation: (1) Broadly follows HELAA build out assumption for 2 sites/2 developers. Commencement pushed back following discussions with site promoters and DCC to reflect requirement for Cullompton relief road and other infrastructure. This results in completions from 2022/23 (2) Delivery of remainder expected to commence later in plan period, reflecting gradual acceleration of delivery for allocation as a whole. Build out broadly follows HELAA assumptions based on four development sites (phased commencements). Allocation fully built out by 2032/33.	Allocation is first phase of Culm Garden village. East Cullompton draft masterplan and vision for wider Garden Village area now complete. To cabinet 3 <sup>rd</sup> January – consultation to follow. Expect final masterplan summer 2019

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). <i>Approvals outside monitoring year shown in red</i>	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
Knowle Lane	CU13	296	13/00035/MOUT, 15/00650/MARM (266 dwellings). 16/01988/MOUT (74 dwellings)	Initial RM Approval November 2015: 266 dwellings. Outline approval March 2018 (following appeal): additional 74 dwellings.	207	Outline permission for additional 74 units brings total LPR provision to 340; + 44 more dwellings than proposed allocation. Outline approval extends boundary of site south to Knowle Lane.	Majority of site being built out by Barratt Homes/ David Wilson. Appeal site (74 units): Mr J Tizzard. Cullompton LVA LLP c/o Ian Jewson Planning	Commencement on site April 2016: 133 completions, 59 under construction, 148 with approval only (including 74 with outline) as of 31 March 2018. Build out for 'phase 1' based on indicative delivery rates provided by developer (completions in 17/18 were higher than projected). Build out for 'phase 2' (74 dwellings with outline permission) conforms to HELAA methodology. Expect allocation fully built out by 2022/23.	Separate access should allow 74 dwellings with outline permission to build out alongside larger previously consented element.
Ware Park and Footlands	CU14	38	No		0			Expected later in plan period after completion of Knowle Lane. Also requires delivery of North West Cullompton linking road. Commencement therefore coincides with remainder of North West Cullompton allocation (element not currently subject to planning applications). Build out conforms to HELAA methodology.	

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). Approvals outside monitoring year shown in red	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
Land at Exeter Road	CU15	24	15/00814/MFUL	Approval September 2015: 24 dwellings	0	n/a (allocation was amend in LPR 2017 proposed submission version to reflect existing consent)		Site fully built out May 2017.	
Cummings Nursery	CU16	100	13/00859/MOUT 15/00934/MARM	RM approval February 2016: 100 dwellings	9	n/a	Devonshire Homes	Commencement on site March 2016. Majority of site now complete; 9 dwellings remaining under construction as of March 2018. Therefore expect completion in 2018/19.	
Colebrook (contingency)	CU21	0			0			Contingency site so does not form part of Local Plan Review trajectory.	
Wellparks	CRE1	185	14/00830/MOUT 16/01898/MARM	RM approval April 2017: 185 dwellings	185	n/a	Devonshire Homes	Commencement on site July 2017; 37 dwellings under construction as of March 2018. Build out based on phasing plan provided by developer as part of planning application. Anticipate site fully built out 2022/23 (at latest).	
Red Hill Cross	CRE2	135	11/00602/MOUT (LAPSED 28/6/2015)		0			Delivery of site expected to follow on from Pedlerspool (CRE5), therefore commencement pushed back further than if based on HELAA assumption alone. Completions expected between 2022/23 and 2025/26; follows HELAA build out assumptions.	Site in same family ownership as Pedlerspool (CRE5)

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). <i>Approvals outside monitoring year shown in red</i>	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
Cromwells Meadow	CRE3	35	17/00982/MFUL	Approval March 2018: 49 units	49	+14 more than allocation	Persimmon Homes	Build out conforms to HELAA assumptions for sites with planning permission. Completions from 2019/20, site fully built out 2021/22. Likely to be conservative assumption based on ITSW notice (April 2018).	Intention to start work notice – April 2018.
Woods Group	CRE4	8	No		0			Agreed with case officers for Crediton area team that delivery of site outside of first five year period was a reasonable assumption based on historic constraints. Build out follows HELAA; completion 2023/24.	Brownfield site.
Pedlerspool	CRE5	200	17/00348/MOUT	<i>Planning committee granted outline approval September 2018 subject to S106: 257 dwellings and up to 5 Gypsy &amp; Traveller pitches</i>	0	Proposed allocation for 200 in Local Plan Review; application approved September 2018 is 62 units above this total.	Gleeson Developments Ltd/Persimmon Homes	Commencement and build out of site conforms to HELAA methodology based on an unconsented allocation for 200 dwellings. Current planning status of site would suggest HELAA assumptions in this case are reasonable – adds confidence to expectation of site delivery. Trajectory at present only accounts for the allocated 200 units (position as of March 2018); anticipates site built out by 2025/26 (would be year later based on 257 dwellings).	Developer rep states that site ‘can be brought forward quickly and easily’ (ID 6685 – 2017). Outline permission includes 8.6 hectares of land made available to facilitate the relocation of Crediton Rugby Club; relevance to Sports Field site (CRE6)

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). Approvals outside monitoring year shown in red	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
Sports Fields	CRE6	120	No		0		Site currently used by Crediton Rugby Club	Policy states requirement for rugby club relocation prior to development of site. Sports pitch provided as part of Pedlerspool approval (see CRE5 above). Have applied caution and pushed back delivery later than Pedlerspool. Build out assumptions from 2022/23 follow HELAA methodology; completion by 2025/26.	Rugby pitch secured with approval of CRE5 (see above)
Stonewall Lane	CRE7	50	No		0		Playing fields owned by Queen Elizabeth Academy Trust.	Delivery of site would require provision of alternative sports facility. Based on area case officer advice, have applied caution and assumed delivery outside first 5 years of plan. Build out assumptions from 2023/24 follow HELAA methodology; completion by 2024/25.	
Land at Barn Park	CRE8	20	No (ongoing discussions)		0		DCC/ Devon & Cornwall housing	Small allocation, considered deliverable in line with HELAA assumptions; completion by 2021/22.	DCC owned site; sale agreed with Devon & Cornwall housing subject to granting of planning permission. Understand that developer has intention to submit application in near future (2019).

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). Approvals outside monitoring year shown in red	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
Alexandra Close	CRE9	15	No		0			Small allocation, considered deliverable in line with HELAA assumptions; completion by 2021/22.	
Newton Square	BA1	5	No		0			Small site but some uncertainty over delivery as per discussion with area case officer. Suggest delivery in 2022/23 (later in 5 year period) would be a reasonable conservative assumption.	
Stone Crushing Works (Scott's Quarry)	BA2	18	12/01625/MFUL	Approved on appeal October 2013: 18 dwellings	18		Fortbury Homes	Under construction (6 units commenced, 12 with permission only as of March 2018). Build out of remainder conforms to HELAA assumptions for site currently under construction; anticipate completion by 2019/20.	

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). <i>Approvals outside monitoring year shown in red</i>	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
Ashleigh Park	BA3	7	12/00201/FULL (7 dwellings) 13/01437/FULL (3 dwellings)	Appeal allowed April 2013: 7 dwellings. Replaced by Full application for 3 dwellings, approved December 2013.	0	4 fewer than proposed allocation		Completion of 3 dwellings, Feb 2017. Delivery of remaining 4 dwellings from allocation now considered unlikely given development footprint of 3 completed dwellings and gradient/access constraints of remaining land (based on case officer advice).	
School Close	BA4	26	10/00510/MOUT 16/00473/MARM	RM approval September 2016: 26 dwellings	26		C Rowlands	Build out conforms to HELAA assumptions for site with planning permission; completion 2020/21.	Remaining part of previous allocation (other part built out). Case officer confirmed commencement certificate issued September 2018 (after end of monitoring year)
Hollywell	BO1	20	No		0			Smaller allocation, considered deliverable broadly in line with HELAA assumptions; completion by 2022/23.	
West of Godfreys Gardens	BO2	6	13/01207/FULL	Approval April 2014: 6 dwellings	0	No change		Completed March 2015	
Hele Road	BR1	7	No		0			Small allocation, considered deliverable in line with HELAA assumptions; completion by 2020/21.	
Barton	CH1	20	No		0			Smaller allocation, considered deliverable broadly in line with HELAA assumptions; completion by 2022/23.	

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). <i>Approvals outside monitoring year shown in red</i>	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
Land off Church Lane	CB1	20	No		0			Smaller allocation, considered deliverable broadly in line with HELAA assumptions; completion by 2022/23.	
Barnshill Close	CF1	7	17/01660/MOUT	Recommended for outline approval subject to S106; 10 dwellings (as of January 2019)	0	(approval would be +3 more than proposed allocation)	Rosebourne Country Homes Ltd (c/o WYG)	Commencement and build out of site conforms to HELAA methodology based on an unconsented allocation for 7 dwellings (position as at 31 March 2018). Current planning status of site (see left) would suggest HELAA assumptions in this case are reasonable (taking account of additional 3 dwellings); adds confidence to delivery assumptions. Completion 2020/21.	Reserved matters expected March 2019.
Land adjacent school	CF2	22	17/00173/MOUT 18/00705/MARM	Outline approval January 2018: 28 dwellings and 90sqm A1 retail. <i>Reserved matters approved May 2018 (as outline)</i>	28	+6 more than proposed allocation	Mr S Yeandle (c/o N Jillings)	Build out follows HELAA assumptions for site of this size with planning permission. This suggests completion 2020/21 which is realistic given current planning status of site (see left – RM approval 2018/19).	
Old Abattoir	CO1	30	16/01888/MOUT 18/00936/MARM	Outline approval July 2017: 40 dwellings. <i>Reserved matters approved November 2018 (as outline)</i>	40	+10 more than proposed allocation	Moorview Homes Ltd (c/o H Barry - LRM Planning)	Build out follows HELAA assumptions for site of this size with planning permission. This suggests completion 2021/22 which is realistic given current planning status of site (see left – RM approval 2018/19).	

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). <i>Approvals outside monitoring year shown in red</i>	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
Linhay Close	CL1	6	18/01634/MFUL	Awaiting decision as of January 2019 (19 dwellings)	0	(Application for +13 more than proposed allocation)	Mr Kerslake c/o XL Planning	Small allocation, considered deliverable in line with HELAA assumptions; completion by 2020/21.	Recent application indicates willingness of land owner/developer and supports build out assumptions.
Hunters Hill	CL2	10	16/00693/MOUT 16/01734/MARM	RM approval February 2017: 13 dwellings	10	+ 3 more than proposed allocation	Mr A Lehner	Commencement on site 2017, 3 dwellings complete as of March 2018. Build out of remainder follows HELAA assumptions for site under construction; anticipate completion in 2018/19.	Full Approval for 14 dwellings on adjacent site June 18 (outside allocation)
Land adjacent Fishers Way	HA1	10	18/01091/MOUT	Awaiting decision as of January 2019 (10 dwellings)	0	(Application dwelling numbers as proposed allocation)	Mr & Mrs Fisher c/o Bell Cornwell	Small allocation, considered deliverable in line with HELAA assumptions; completion by 2020/21.	Recent application indicates willingness of land owner/developer and supports build out assumptions.
Greenaway	MO1	20	No		0			Smaller allocation, considered deliverable broadly in line with HELAA assumptions; completion by 2022/23.	
Court Orchard	NE1	25	16/01836/MARM (ARM following OUT)	Approval March 2017: 25 dwellings	25		Kingswood Homes c/o PCL Planning	Commenced on site May 2017, 14 dwellings under construction as of March 2018. Build out follows HELAA assumptions, anticipate completion 2019/20.	
Former Tiverton Parkway Hotel	SP1	10	No		0			Small allocation, considered deliverable in line with HELAA assumptions; completion by 2021/22.	

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). <i>Approvals outside monitoring year shown in red</i>	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
Higher Town	SP2	60	17/01359/MOUT	Awaiting decision as of January 2019. Planning committee (July 2018) minded to refuse subject to implications report. No confirmation of date due back to committee.	0		N. Jillings (Place Land)	Delivery pushed back to coincide with Junction 27 development. Site would be fully built out by 2023/24 based on HELAA methodology build out assumptions with delayed commencement (first completions 2022/23).	<a href="#">Inspector's letter</a> following preliminary LPR hearings. Willingness of land owner/developer – see recent application.
Fanny's Lane	SA1	27	13/00498/MFUL (full application for part of site previously allocated)	Approval February 2014: 19 dwellings	0			19 dwellings completed October 2015. Remaining 8 dwellings considered deliverable in line with HELAA assumptions; completion by 2020/21.	
Old Butterleigh Road	SI1	8	17/01751/FULL	<i>Approval October 2018: 5 dwellings</i>	0	Approval October 2018 is 3 dwellings fewer than proposed allocation	Pemberton Hutton Developments Ltd (c/o N Jillings)	Current planning status of site (see left) taken into account; move forward delivery by one year v HELAA assumptions. Completion 2019/20.	
The Garage	SI2	5	17/01395/FULL	<i>Approval October 2018: 5 dwellings</i>	0		Dennis Murphy c/o Hilary Lawson	Current planning status of site (see left) taken into account; move forward delivery by one year v HELAA assumptions. Completion 2019/20.	

Site Location	Policy	Allocation Total (in plan period; includes commitments)	Application Received? (Full or outline)	Decision (Date & Number of units approved, signed S106?). Approvals outside monitoring year shown in red	Total Commitments (as at 31st March 2018)	Changes from initial proposal (housing numbers v allocation/outline etc.)	Landowner, site promoter or developer	Delivery assumptions: HELAA market conditions model or alternative where evidence available; indication of completion date (if known) Please refer to trajectory (Appendix 1) for projected build out rates. For further detail on current development status of sites see Appendix 2.	Additional evidence/issues affecting site deliverability
South of Broadlands	TH1	12	17/00878/MOUT	Outline approval August 2018: 16 dwellings	0	+4 above allocation	Church Commissioners c/o Deloitte	Commencement and build out of site conforms to HELAA methodology based on an unconsented allocation for 12 dwellings (position as at 31 March 2018). Current planning status of site (see left) would suggest HELAA assumptions in this case are reasonable (taking account of 4 additional dwellings). Completion 2020/21 (would be year later for 16 dwellings based on HELAA)	
West of Uffculme	UF1	60	15/00108/MOUT 17/01370/MARM	Outline granted on appeal April 2016. RM approval December 2017: 60 dwellings	60		DCH Group c/o WYG	Build out follows HELAA assumptions for site of this size with planning permission. Anticipate completion 2021/22. Likely to be conservative assumption based on commencement (since end of monitoring year)	Intention to start work notice issued January 2018. MDDC monitoring recorded commencements from August 2018 (outside monitoring year)
Land east of M5	WI1	42	16/01811/MOUT (259 dwellings) 18/00175/MOUT (125 dwellings)	Outline for 259; appeal dismissed November 2017. Outline for 125 refused October 2018 (January 2019: applicant has appealed - waiting for confirmation of appeal date)	0	Both refused applications for larger sites than proposed allocation.	Gallagher Estates c/o Turley	Build out follows HELAA assumptions for unconsented allocation of 42 dwellings; completions 2022/23.	Applications demonstrate willingness of landowner/developer.

# **APPENDIX 5: FIVE YEAR HOUSING LAND SUPPLY CALCULATIONS**

## Scenario 1: 'Sedgefield' approach with 20% buffer

### Housing requirement

<b>2018/19-2022/23 (Years 1-5)</b>		
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	<b>TOTAL REQUIREMENT 2018-2023 (F)</b>	<b>2200</b>
<b>2023/24-2027/28 (Years 6-10)</b>		
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)	4471
D	Shortfall to date 2013-2023 (B-C)	-541
E	5 year requirement 2023-2028 (A*5)	1965
F	5 year requirement with shortfall 2023-2028 (E+D)	1424
G	<b>TOTAL REQUIREMENT 2023-2028 (F)</b>	<b>1424</b>
<b>2028/29-2032/33 (Years 11-15)</b>		
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)	7187
D	Shortfall to date 2013-2028 (B-C)	-1292
E	5 year requirement 2028-2033 (A*5)	1965
F	5 year requirement with shortfall 2028-2033 (E+D)	673
G	<b>TOTAL REQUIREMENT 2028-2033 (F)</b>	<b>673</b>

### Five year housing land supply against requirement

		<b>2018/19- 2022/23</b>	<b>2023/24- 2027/28</b>	<b>2028/29- 2032/33</b>
G	Requirement (accounting for shortfall/over-delivery) without buffer	2200	1424	673
H	Requirement (accounting for shortfall/over-delivery) + 20% buffer (G*1.2)	2640	-	-
I	Housing supply (see trajectory in Appendix 1)	2741	2716	1947
J	5 year land supply without buffer ((I/G)*5)	-	<b>9.54</b>	<b>14.47</b>
K	5 year land supply with 20% buffer ((I/H)*5)	<b>5.19</b>		

## Scenario 2: 'Sedgefield' approach with 5% buffer

### Housing requirement

<b>2018/19-2022/23 (Years 1-5)</b>		
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	<b>TOTAL REQUIREMENT 2018-2023 (F)</b>	<b>2200</b>
<b>2023/24-2027/28 (Years 6-10)</b>		
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)	4471
D	Shortfall to date 2013-2023 (B-C)	-541
E	5 year requirement 2023-2028 (A*5)	1965
F	5 year requirement with shortfall 2023-2028 (E+D)	1424
G	<b>TOTAL REQUIREMENT 2023-2028 (F)</b>	<b>1424</b>
<b>2028/29-2032/33 (Years 11-15)</b>		
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)	7187
D	Shortfall to date 2013-2028 (B-C)	-1292
E	5 year requirement 2028-2033 (A*5)	1965
F	5 year requirement with shortfall 2028-2033 (E+D)	673
G	<b>TOTAL REQUIREMENT 2028-2033 (F)</b>	<b>673</b>

### Five year housing land supply against requirement

		<b>2018/19- 2022/23</b>	<b>2023/24- 2027/28</b>	<b>2028/29- 2032/33</b>
G	Requirement (accounting for shortfall/over-delivery) without buffer	2200	1424	673
H	Requirement (accounting for shortfall/over-delivery) + 5% buffer (G*1.05)	2310	-	-
I	Housing supply (see trajectory in Appendix 1)	2741	2716	1947
J	5 year land supply without buffer ((I/G)*5)	-	<b>9.54</b>	<b>14.47</b>
K	5 year land supply with 5% buffer ((I/H)*5)	<b>5.93</b>		

### Scenario 3: 'Liverpool' approach with 20% buffer

#### Housing requirement

<b>2018/19-2022/23 (Years 1-5)</b>		
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	<b>TOTAL REQUIREMENT 2018-2023 (G)</b>	<b>2043</b>
<b>2023/24-2027/28 (Years 6-10)</b>		
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)	4471
E	Shortfall to date 2013-2023 (C-D)	-463
F	5 year requirement 2023-2028 (A*5)	1965
G	5 year requirement with shortfall 2023-2028 (F+E)	1502
H	<b>TOTAL REQUIREMENT 2023-2028 (G)</b>	<b>1502</b>
<b>2028/29-2032/33 (Years 11-15)</b>		
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)	7187
E	Shortfall to date 2013-2028 (C-D)	-1214
F	5 year requirement 2028-2033 (A*5)	1965
G	5 year requirement with shortfall 2028-2033 (F+E)	751
H	<b>TOTAL REQUIREMENT 2028-2033 (G)</b>	<b>751</b>

#### Five year housing land supply against requirement

		<b>2018/19- 2022/23</b>	<b>2023/24- 2027/28</b>	<b>2028/29- 2032/33</b>
H	Requirement (accounting for shortfall/over-delivery) without buffer	2043	1502	751
I	Requirement (accounting for shortfall/over-delivery) + 20% buffer (H*1.2)	2452	-	-
J	Housing supply (see trajectory in Appendix 1)	2741	2716	1947
K	5 year land supply without buffer ((J/H)*5)	-	<b>9.04</b>	<b>12.96</b>
L	5 year land supply with 20% buffer ((J/I)*5)	<b>5.59</b>		

## Scenario 4: 'Liverpool' approach with 5% buffer

### Housing requirement

<b>2018/19-2022/23 (Years 1-5)</b>		
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	<b>TOTAL REQUIREMENT 2018-2023 (G)</b>	<b>2043</b>
<b>2023/24-2027/28 (Years 6-10)</b>		
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)	4471
E	Shortfall to date 2013-2023 (C-D)	-463
F	5 year requirement 2023-2028 (A*5)	1965
G	5 year requirement with shortfall 2023-2028 (F+E)	1502
H	<b>TOTAL REQUIREMENT 2023-2028 (G)</b>	<b>1502</b>
<b>2028/29-2032/33 (Years 11-15)</b>		
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)	7187
E	Shortfall to date 2013-2028 (C-D)	-1214
F	5 year requirement 2028-2033 (A*5)	1965
G	5 year requirement with shortfall 2028-2033 (F+E)	751
H	<b>TOTAL REQUIREMENT 2028-2033 (G)</b>	<b>751</b>

### Five year housing land supply against requirement

		<b>2018/19- 2022/23</b>	<b>2023/24- 2027/28</b>	<b>2028/29- 2032/33</b>
H	Requirement (accounting for shortfall/over-delivery) without buffer	2043	1502	751
I	Requirement (accounting for shortfall/over-delivery) + 5% buffer (H*1.05)	2146	-	-
J	Housing supply (see trajectory in Appendix 1)	2741	2716	1947
K	5 year land supply without buffer ((J/H)*5)	-	<b>9.04</b>	<b>12.96</b>
L	5 year land supply with 5% buffer ((J/I)*5)	<b>6.39</b>		