

# Malvern Hills Five Year Housing Land Supply Report

# 2020

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Includes: Position statement at 1 April 2020, methodology, analysis and evidence supporting the five year housing land supply calculation.

Published September 2020





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## 1. Introduction

1.1 This report provides a full explanation of the five year housing land supply (5YHLS) calculation for Malvern Hills as required by the National Planning Policy Framework (NPPF). It sets out the housing requirement, delivery to-date and identifies deliverable housing sites for the five year period 1 April 2020 to 31 March 2025. The report includes an appropriate in-depth analysis of sites with planning permission and those that are allocations in the adopted South Worcestershire Development Plan (SWDP) (February 2016) to provide additional evidence about deliverability and to ensure that the supply calculation is robust.

1.2 It should be noted that, due to the impacts of the COVID-19 pandemic, site visits which are usually undertaken in April were delayed until June. Given that the development industry was shut down from late March until lockdown began to ease in May, this delay is not deemed detrimental in terms of the data collected for the 2019/20 monitoring year. In addition, the impact of the lockdown has been taken account of in delivery assumptions; see Chapter 7 of this Report.

## 2. Housing Requirement

2.1 Previously Malvern Hills has used the full Objectively Assessed Housing Need (OAHN) figure for the Plan period 2006-2030 of 8,590 dwellings. This policy-off figure had been tested by the SWDP Examination Inspector and set out in the Inspector's Further Interim Conclusions on the Outstanding Matters Considered at the Reconvened Stage 1 Hearing<sup>1</sup> (31 March 2014). The SWDP has subsequently been through a further period of examination where policy constraints were considered and the Plan was then adopted in February 2016.

2.2 The adoption of the Plan means that a policy-on target now applies for Malvern Hills District. 5,650 dwellings are required to be delivered between 2006 and 2030 as set out in Policy SWDP3 (Table 4b(i)). The revision of the target following plan adoption also means that the annual requirement has changed. The SWDP Inspector endorsed a stepped target as set out in Policy

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<sup>1</sup> <http://www.swdevelopmentplan.org/?s=Further+Interim+Conclusions>

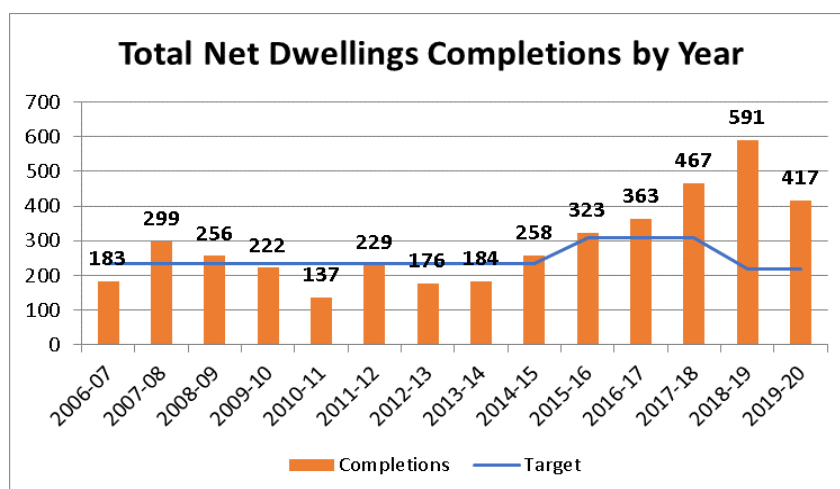
SWDP3 (Table 4b(ii)). A policy-on target of 235 dwellings per annum is used from 2006-2015 followed by a requirement of 308 dwellings per annum for three years (2015-18), the target is then reduced to 217 dwellings per annum for the remainder of the Plan period (until 31 March 2030). This short term increase in housing target is to allow for lead-in times on the larger urban extensions in the Wider Worcester Area (WWA) (i.e. SWDP45/1 and SWDP45/2) and to ensure the SWDP as a whole and across all sub-areas has a rolling five year supply of housing.

2.3 It is important to note that the WWA five year housing land supply position will be calculated and published separately to the Malvern Hills calculation, as recommended by the SWDP Examination Inspector. There will be two separate WWA calculations; one for Wychavon District WWA and one for Malvern Hills WWA.

### 3. Completions

3.1 Completions from the outset of the Plan period 1 April 2006 to 31 March 2020 are **4,105**; overall this is significantly above the cumulative annual requirement for completions from 2006. Completions over the last five monitoring periods have increased significantly, with an all time high of **591** recorded in 2018-19. This demonstrates Malvern Hills District Council’s success in addressing a previous shortfall in supply by taking a proactive approach and approving a significant number of housing developments. Further information relating to completions can be found in Appendix 1.

**Table 1 Completions in Malvern Hills District from 1 April 2006- 31 March 2020**



## 4. Calculating Past Under or Oversupply

4.1 Any shortfall in delivery, or indeed over supply, against the annualised requirement is factored in to the five year calculation.

4.2 The housing requirement, as explained above, is that endorsed by the SWDP Examination Inspector set out in Policy SWDP3 (Tables 4b(i) and 4b(ii)). The requirement for Malvern Hills District (excluding the Wider Worcester Area) is 5,650 dwellings from 2006-2030. The Inspector supported a stepped approach of 235 dwellings per annum from 2006-2015, 308 dwellings per annum from 2015-2018 and 217 dwellings per annum for the remainder of the Plan period until 2030. Therefore, the requirement for the thirteen years from 2006-2019 is 9 years at 235 dwellings plus three years at 308 dwellings and two years at 217 dwellings, which equates to a requirement of 3,473 dwellings. To establish the under or over supply, all completions during this period are subtracted from this requirement figure.

$$3,473 \text{ (Requirement 2006-2020)} - 4,105 \text{ (Completions 2006-2020)} = 632 \text{ (surplus)}$$

4.3 Malvern Hills District Council has worked positively to address the former undersupply and now has a significant surplus in supply against the cumulative target. The state of the housing market is a significant factor in performance, and shortfalls have been a feature since the start of the SWDP Plan period in 2006. To highlight the significant progress made in recent years, the shortfall in 2013-14 was 194 dwellings. 2017-18 saw the first surplus of the Plan period (since 2009-10) of 58 dwellings; this has increased significantly to 629 dwellings in 2019-20. There are some **374** dwellings currently under construction; therefore it is likely that this surplus will increase in the next 12 months.

## 5. Addressing Past Oversupply

5.1 In terms of addressing the oversupply, rather than reduce the target by the full oversupply in the first five years, the Council have adopted a cautious approach and spread the oversupply over the remaining Plan period. When this approach has been used to deal with undersupply it has been called the 'Liverpool approach'. The 632 dwelling surplus has been divided by the number of years

remaining in the plan period (10), and multiplied by five years to establish the number that can be deducted from the five year target. Therefore in this case the Council are deducting 315 dwellings from the 5 year target.

**$632$  (surplus)  $\div$  **10** (years remaining in plan) = **63** (discount per annum from target)**

**$63$  (discount per annum from target)  $\times$  **5** (years) = **315** (discount from 5 year target)**

**$1,085$  (5 years  $\times$  217) - **315** (discount from 5 year target) = **770** (5 year target taking account of oversupply)**

## 6. Buffer

6.1 In accordance with the NPPF (Paragraph 73), Malvern Hills is required to test its supply of sites against the housing requirement with an additional buffer. The South Worcestershire Council's latest Housing Delivery Test measurement (2019, published February 2020) is 176%, so in accordance with in National Planning Practice Guidance (Paragraph: 037 Reference ID: 3-037-20180913), the Council consider that the application of a 5% buffer is reasonable and appropriate. A five percent buffer equates to an additional 39 dwellings.

**$770$  (5 year target) + **39** (5% buffer) = **809** (5 year target with 5% buffer applied)**

## 7. Lead Times and Delivery Rates

7.1 Before explaining the different categories of sites which will deliver housing within Malvern Hills District in the next five years, it is important to set out the approach that has been taken by the Council to ensure that the supply is robust.

7.2 A substantial amount of detailed work has been undertaken to assess sites and to identify the number of dwellings that will be delivered within the next five years. Large sites (this is generally sites of 5 dwellings or more, unless where stated otherwise for the purposes of data analysis in the report) have been carefully assessed as these represent a significant proportion of the current sites with planning permission not yet started and are therefore a very important component of supply.



7.3 Where work is already underway on large sites, Officers have assessed their potential rate of delivery to establish whether the total number of dwellings with planning permission can realistically be achieved within a five year period. Factors that can influence the delivery rate include the number of developers (outlets) on site, the type of site, e.g. brownfield / greenfield and any requirements for infrastructure provision. In all cases sites are small enough to easily be delivered within five years based on existing local build rates (see Appendix 4 for further details). The largest sites that have been developed in Malvern Hills over the past seven years (using a sample of sites of 30 dwellings or more) are generally being completed within one to three years of commencement, with an average build rate of 30 dwellings per annum.

7.4 In looking at large sites (of 10 dwellings or more) with planning permission where there has been no start made as at 1st April 2020, promoters and landowners have been engaged to understand their intentions for delivery and to consider what evidence there is that house completions will begin within the next five years. Information relating to this is provided in Appendix 5 (Deliverability Questionnaire) and Appendix 6 (Questionnaire Responses). The information has been considered in conjunction with local evidence and assumptions regarding lead in times and delivery rates in Malvern Hills so as not to simply rely without question on the statements and information provided by landowners, developers and house builders in respect of their own sites. Consideration has also been given to landownership and/or who the applicant is (i.e. whether the application has been submitted on behalf of a housebuilder and/or whether the land is owned by a housebuilder). In adopting this cautious approach the Council has assumed the following, unless there is extremely robust clear evidence to suggest otherwise:

1. On allocated sites where an application has been submitted and a housebuilder is the applicant and has responded to the Deliverability Questionnaire about its intentions to start on site, it has been assumed that it will take 30 months until the first legal completion is achieved unless there are any other specific reasons that suggest otherwise. This is reduced to 24 months where an application has been approved subject to a Section 106 agreement, unless there are any other specific reasons that suggest otherwise. This has been further reduced to 18 months where outline planning permission has been granted (i.e. a Section 106 signed); and 12 months where full planning permission has been granted (N.B. for the

avoidance of doubt, in considering sites with planning permission, a distinction has been drawn between those which have full planning permission and large sites which only have outline permission, in accordance with the definition of 'deliverable' set out in the Glossary to the NPPF – see below at Paragraph 8.1). This is considered a cautious approach as it has been demonstrated in the District that developers have and continue to achieve initial completions within one year of getting full planning permission on the large site unless there are site specific constraints (see Appendix 4). Local evidence demonstrates that the smaller large schemes, for example those between 10 and 20 dwellings, are completely built out within 12 months once a housebuilder is on site.

2. A conservative delivery rate of 30 dwellings per annum per 'outlet' has been assumed for volume house builders (e.g. Taylor Wimpey, Bovis etc.) once a site is up and running and into its first full year of production although the local evidence provided in Appendix 4 shows that this has been higher in the District. This assumption is also supported by analysis undertaken by White Young Green in National House builders' annual reports looking at the number of sites and the number of completions over a particular year, although this work is not specific to Malvern Hills District. Where there is strong local evidence of a particular house builder delivering higher rates on a similarly sized site this has influenced Officer assumptions about build rates and any assumptions are clearly stated in the text in either section 8 or 9.
3. In some cases for the large sites where it is known that affordable housing will be delivered separately to the market dwellings e.g. by a Registered Social Landlord, the 30 dwellings per annum has been increased by 40% to 42 dwellings per annum.
4. Due to the impacts of the COVID-19 pandemic, much of the development industry, particularly the large volume housebuilders, shut down from late March until lockdown began to be eased in May. In order to reflect this slow-down in delivery over this ten week period and a degree of uncertainty about how quickly construction would return to pre-pandemic levels, a blanket 50% reduction is being applied to the assumed delivery rates for the 2020/21 monitoring year.

7.5 Although the evidence provided demonstrates that in most cases Malvern Hills is delivering above the levels of these assumptions, a cautious approach has been taken to ensure that the 5YHLS position is as robust as possible.

## 8. Sites with Planning Permission not Started or Under Construction

8.1 The NPPF Glossary definition of 'Deliverable' states that *"to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years"*. It adds that *"sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans)"*, and that *"where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years"*.

8.2 All sites with planning permission have been reviewed and there are a few sites, for reasons set out below, that have been discounted as there is sufficient evidence available to determine that they will either not be implemented at all within five years, or it is likely to take longer than five years to deliver the total number permitted.

8.3 To inform this decision-making process **all** large sites (10 dwellings and over) where there was no start on site at 1st April 2020 were sent a Deliverability Questionnaire (Appendix 5). The responses to this detailed questionnaire have been considered and taken into account when making assumptions about the delivery of these sites; although disappointingly not all developers have responded (all detailed responses are published in a table at Appendix 6). In most cases the phasing set out in section 7 of this report has been used in conjunction with local delivery data set out in Appendix 4 as many developers already have a proven track record of delivery in the District. By

considering all this data along with any additional information that developers and agents have provided Officers have made the 5YHLS position as robust as possible.

8.4 Further to the changes to the NPPG, the Council has incorporated an element of residential institutions within use class C2. There are currently three applications, either in whole or in part use class C2, which are included within the supply. The number which have been included in the supply has been calculated by dividing the total number of C2 units by the average household size, which for Malvern Hills District is 2.32.

8.5 A Summary of discounted sites with planning permission not started is set out below (for full assessment see Appendix 3):

**18/01088/FUL QinetiQ, St Andrews Road, Malvern, WR14 3PS**

The site has full planning permission, granted September 2019, for the erection of 310 dwellings and a 66 bed C2 care home. No update received from the developer, however there have been several recent applications to modify the approved scheme and construct a spine road. Assuming a cautious delivery rate of 30 dwellings per annum from 2022/23, which includes an additional 12 months for demolition of existing buildings, along with the construction of the C2 care home (28 units assumed), 118 dwellings are considered deliverable within five years. **220 dwellings discounted.**

**17/00372/OUT Land North East of Upton Marina, East Waterside, Upton-upon-Severn**

The site has outline planning permission, granted April 2019, for up to 70 dwellings. No response received from the agent, and given the uncertainty surrounding its short-term delivery prospects, in keeping with a cautious approach the Council is discounting this site from the five year calculation. **70 dwellings discounted.**

Total number of dwellings with planning permission not started = **1,136**

Total number discounted from delivery within five years = **290**

**1,136 - 290 = 846**

**Total number of deliverable dwellings\* with planning permission not started = 846**

\*within five years

## 9. Deliverable Allocated Sites in the Adopted SWDP (2016)

9.1 All sites allocated in the adopted SWDP including: those with planning permission but not yet started; those with a resolution to grant planning permission; and those without planning permission were sent a Deliverability Questionnaire.

9.2 This questionnaire is sent annually to landowners, developers and promoters and provides an updated picture on the progress of the site, the intentions of stakeholders and highlights any slippage. Where the contact has not responded to the update request a previous response has been used unless it is well out of date along with Officer's careful consideration of the factors relevant to the site. All responses have been scrutinised by Officers and not simply relied upon without question.

9.3 The questionnaire includes questions about any known viability issues, any site specific constraints and more detailed questions around phasing and delivery. Questions include: when do you expect to start work on site (month/year)? How many housebuilders will/are likely to develop the site? How many completions do you expect to achieve each year (April to April)? And therefore how many homes do you anticipate being delivered on site within the next five years to April 2025? (See Appendix 5 for full questionnaire).

9.4 In assessing the questionnaires to ensure that the assumptions are as robust as possible **only sites where the landowners/ agents/ developers have already submitted a planning application** have been included as deliverable SWDP sites. This is considered a conservative approach as there are a number of additional sites that are highly likely to be delivered within five years but the promoter has yet to submit a formal application.

9.5 The following sites have been included in the 5YHLS calculation as deliverable SWDP sites within five years:

### **SWDP59/3 Land at Hope Lane, Clifton-upon-Teme**

No update received, however the site is subject to a current planning application 18/01515/FUL for 23 dwellings. The DM Officer has advised that the Section 106 agreement is nearing completions and that a positive decision is likely to be issued within weeks. On that basis and given the size of the

site, it is considered deliverable within five years and is including in the five year calculation. **23 dwellings deliverable within five years.**

**SWDP61/\* Land off Pearl Lane, Astley Cross**

The developer has indicated that work will commence on site in early 2021 subject to the granting of current planning application 17/01710/FUL for 57 dwellings. The DM Officer has confirmed that the Section 106 agreement is nearing completion and that a decision is likely to be issued within the next month or so. On that basis, and even in assuming a more cautious first completions in 2022/23 with 30 dwellings delivered per annum, the site is easily deliverable within five years. **57 dwellings deliverable within five years.**

**Total number of deliverable allocated dwellings\* = 80**

\*within five years

## 10. Lapse Rate

10.1 The Inspector conducting the SWDP Examination concluded that adopting a 5% lapse rate would be “robust and sound” for the Plan across the three administrative areas.

10.2 Summing all the ‘lapsed permitted dwellings’ 2006/07 to 2019/20 and dividing that by the total gross number of dwellings with outstanding planning permissions over the same period, gives an average lapse rate of 6.15%. 2017/18 saw a spike in the number of expired planning permissions, with 381 expiries at a rate of 26.29%. Of the eight large site planning permissions that lapsed during 2017/18, six totalling 268 lapsed dwellings have subsequently had new planning permissions granted for a total of 322 dwellings, and the remaining two are SWDP allocations with current planning applications pending determination. So although the average lapse rate has increased to higher than the 5% lapse rate for which the SWDP Examination Inspector concluded would be “robust and sound”, a 5% lapse rate is still deemed appropriate. Appendix 7 provides further information relating to lapse rates.

**A 5 % Lapse rate** has been assumed.

Table 2 Malvern Hills Planning Permission Lapse Rates 2006/07-2019/20

Year of Expiry	Number of Dwellings Expired	Total Outstanding Commitments (Gross)	Lapse Rate %
2006/07	17	1,286	1.32
2007/08	24	1,235	1.94
2008/09	28	1,192	2.35
2009/10	118	1,013	11.65
2010/11	103	894	11.52
2011/12	76	865	8.79
2012/13	125	611	20.46
2013/14	34	996	3.41
2014/15	115	1,684	6.83
2015/16	16	1,899	0.84
2016/17	29	2,037	1.42
2017/18	381	1,449	26.29
2018/19	15	1,145	1.31
2019/20	15	1,510	0.99
<b>Total over 14 years</b>	<b>1,096</b>	<b>17,816</b>	
<b>Average over 14 year period</b>			<b>6.15%</b>

## 11. Windfalls

11.1 A windfall<sup>2</sup> allowance may be justified in the five year supply if a local planning authority has “*compelling evidence*” as set out in Paragraph 70 of the National Planning Policy Framework.

11.2 Given the above, the Inspector conducting the Examination into the SWDP confirmed in his Interim Conclusions (October 2013) that, in principle, he saw no objection to the Plan accounting for

<sup>2</sup> Windfalls are any sites that are not allocated sites in a Local Plan and have not been previously allocated or identified in the Strategic Housing Land Availability Assessment (SHLAA).

windfalls as part of the supply of housing over the plan period. Therefore an appropriate allowance has been accounted for in the 5YHLS calculation.

11.3 Appendix 8 contains a detailed breakdown of all windfall completions and concludes that small windfalls (sites of 4 dwellings or less not Greenfield or garden land for Malvern Hills District) have been delivered at an average rate of 35 dwellings per annum from 2006 to 2020. The Council has therefore continued to adopt the Inspector's assumption of 35 dwellings per annum looking forward.

11.4 In order to avoid double counting windfall sites that already have planning permission, three years of windfalls have been discounted from the five year calculation. This is consistent with the extremely cautious assumptions set out in the SWDP longer term trajectory. Therefore windfall completions are only assumed for two years from 2023/24 onwards.

A total of **70 windfalls** are added to the five year calculation (i.e. 2 x 35)

11.5 Looking at the future sustained delivery of windfall sites, Officers have in the longer term trajectory assumed that these sites will reduce over time as the SWDP allocation sites come forward. However, the situation is slightly different for Malvern Hills district as the windfall allowance is calculated on small sites of 4 dwellings or fewer. These sites should remain more consistent throughout the plan period than larger sites (i.e. 5 dwelling or more) as they will not be 'replaced' by site allocations, as larger windfall sites could be. However, to ensure that assumptions are up to date delivery will be monitored annually and if there is a change in windfall development the council will adjust its subsequent assumptions accordingly.

11.6 There is evidence to suggest a consistent supply of other windfall sites in the district (Greenfield and Garden land), with average delivery rates over the previous 14 years of 25 and 22 dwellings per annum, respectively. However, in keeping with a cautious approach these sites have not been included as part of the windfall element of the 5YHLS calculation.



## 12. Five Year Housing Land Supply Table

Table 3 Malvern Hills Five Year Housing Land Supply Position at 1 April 2020

		per annum
<b>Adopted SWDP 2016 target</b>	5,650	
<b>Completions 2006-2020:</b>	4,105	
Oversupply (9 years x 235 + 3 x 308 + 2 x 217) - 4,105:	632	
Oversupply reduction with Liverpool approach applied ((632 ÷ 10) x 5)	315	
5 year target using Inspectors methodology in Proposed Modifications and the Inspector's Report Feb 2016 (5 x 217) minus surplus reduction (315):	770	
5 year target + 5%	809	162
Deliverable Planning Permissions Not Started at 1 April 2020 (1,136-290):	846	
Deliverable Allocated Sites in the Adopted SWDP:	80	
Total Deliverable Sites Not Started (926 - 5% lapse rate):	880	
Sites with Planning Permission Under Construction at 1 April 2020:	374	
Windfalls 35 x 2:	70	
Total Supply	1,324	
Balance against +5 %	515	
Total years housing supply against +5%	8.17	

12.1 This table brings together all the elements presented in this report to demonstrate Malvern Hills District's 5YHLS position for 2020-2025 against the annual housing requirement in the adopted SWDP (February 2016).

12.2 Malvern Hills is able to demonstrate that it has **8.17 years** housing supply against the adopted SWDP policy on requirement for market and affordable housing, which includes a 5 percent buffer.

## 13. Maintaining the Housing Land Supply into 2021

13.1 Looking ahead, the 5YHLS position is very likely to remain robust as a number of large sites have already commenced or have permission, and will begin to deliver homes over the next few years that will help maintain the supply. Additionally, the Council will continue to approve planning applications during 2019/20 and many of these will form part of the next 5YHLS update. Malvern Hills have continued to adopt a cautious approach and have not relied unnecessarily on supply components that could affect the ability of the Council to demonstrate a robust 5YHLS position.

## 14. Conclusions

14.1 In accordance with the NPPF (Paragraphs 73-76) the Council have identified and updated a supply of deliverable sites sufficient to provide five years worth of housing against the SWDP3 housing requirement even when an additional buffer of 5 percent is applied.

14.2 A substantial amount of work has been undertaken to ensure that the sites included in the calculation are deliverable in line with the definition set out in the NPPF Glossary. Sites have been assessed to ensure they are available, offer a suitable location for development, are viable and have a realistic prospect that housing will be delivered on the site within five years. Where there is clear evidence that a site will not be delivered within five years it has been discounted, this includes when sites are unviable, where there is no current need for the type of unit, and in the case of some very large sites where the delivery will be phased.

14.3 The Council has not relied entirely on its own judgement and has engaged in additional consultation with developers, land owners and agents on large sites (for the purposes of the deliverability letter this was sites of 10 dwellings or more) to understand their intentions. Where stakeholders have not provided any evidence, the authority has been able to use knowledge gained from those that have, and from trends experienced in the district to make an informed judgement as to the likely delivery of a site.

14.4 The Council has also instructed a consultant to critically assess the 5YHLS 2020-2025 position and their comments have been incorporated into the report.

14.5 The Council is able to robustly demonstrate in excess of five years housing land supply, **8.17 years** (using a 5% buffer) against the Plan requirement of 5,650 dwellings (SWDP 3, adopted February 2016).