

Housing delivery and five-year housing land supply at 1 April 2020

1. This paper provides an update on housing delivery and five-year housing land supply matters. This follows the submission of the Council's supplementary paper on five-year housing land supply (ED178) and Matter 22 statement earlier in 2020.
2. Since the earlier information on housing supply was submitted, the COVID-19 pandemic has had a profound impact upon development activity, the economy and society. In relation to the specific matter of housing delivery, this resulted in:
 - A hiatus in the construction industry followed by a return to work subject to social distancing guidelines. This has affected the rate at which developments might reasonably be anticipated to proceed;
 - A substantial economic impact which is likely to lead to a recession or downturn. This may affect mortgage availability and / or the saleability of new homes. This will potentially impact upon the rate at which sites are completed to meet market demand particularly in the short term; and
 - The postponement of resumed hearings into the Local Plan, originally scheduled to take place in March and April 2020. This means that any final decision by the Inspector upon the soundness of proposed housing allocations in the Plan has been deferred. This has implications, in particular, for the progress and delivery of sites currently within the Green Belt.
3. Since the lifting of the most stringent 'lockdown' restrictions, the Council has completed site visits in order to update housing monitoring figures as at the start of the new monitoring year on 1 April 2020. This paper updates and replaces relevant or equivalent parts of ED178 and the Council's Matter 22 statement.
4. This paper should be read alongside the Council's response to the Inspectors' letter of 8 July 2020 (the Inspectors' letter) which sets out the proposed approach to the objective assessment of housing need and the housing requirement. Further to the Inspectors' letter, the Inspector examining North Hertfordshire's Plan has asked that NHDC also set out any consequential proposed changes to the Plan's approach to housing delivery.
5. All references to 'the Plan' or 'the Local Plan' in this response are to the submitted Plan (LP1) as suggested to be altered by the Proposed Main Modifications issued in November 2018 unless otherwise stated. All references to the National Planning Policy Framework (NPPF) are to the 2012 version unless otherwise stated.

Updated housing monitoring and housing trajectory at 1 April 2020

6. A further **318** net additional homes were completed in the financial year 2019/20. This brings the total built since the start of the plan period in 2011 to **2,814**.

7. Taking into account the factors above, and new permissions granted during 2019/20, an updated housing trajectory has been produced. This is contained in Appendix A in both tabular and graph form, along with an updated 'components of supply' graph. This replicates the formats requested by the Inspector and presented in ED178 and the Council's Matter 22 statement.
8. The revised trajectory shows total potential delivery of **14,656** homes over the Plan period 2011-2031. This is similar to the total figure shown in ED178 (14,841).
9. The trajectory has been informed by informal discussion with representatives for a number of proposed sites in the Plan. Promoters for the largest, strategic sites generally retain an optimistic outlook. Their schemes remain reliant upon the progress of this plan and the subsequent submission and / or determination of planning applications. As such, substantive completions on these sites are not anticipated until the mid-2020s. This can be seen in the 'components of supply' graph referenced above. This provides time for a recovery from current social and economic conditions and it has not been deemed necessary to make substantive alterations to the previous assumptions for most of these sites. However, lower delivery has been assumed from the proposed north of Baldock site (Policy SP14) with a maximum delivery of 250 units per year in the period to 2031. It is now anticipated half the proposed site (1,400 units) might now be delivered within the plan period to 2031.
10. Other proposed allocations remain subject to 'live' applications or pre-application discussions with the Council. Representatives of these sites have indicated they still intend to quickly progress schemes once there is clarity in relation to the Local Plan. It is not considered necessary to make substantial alterations to the assumptions for these sites.
11. The Council's housing team maintains contact with many of the Registered Providers operating in the District. A core group remain keen to expand their portfolios and have active delivery programmes. This provides the potential to 'front load' delivery of affordable housing and ensure continuity of housing supply even if economic conditions do adversely impact upon the private housing market.
12. A maximum of 30 units have been allowed for on most sites where completions are anticipated during the 2020/21 monitoring year. This recognises the immediate impacts of the construction sector and housing market shutdowns during spring 2020 and ongoing social distancing requirements¹. All delivery rates were reviewed to ensure they broadly accord with the latest *Start to Finish* research by Lichfields² as well as with average completions recorded by volume housebuilders in their annual reports.

¹ Two wholly flatted developments which were well progressed prior to the shutdown are likely to complete by the end of 2020 delivering 47 and 71 units respectively. These are included in the anticipated completions for 2020/21 as a justified exception to this approach.

² <https://lichfields.uk/media/5779/start-to-finish-what-factors-affect-the-build-out-rates-of-large-scale-housing-sites.pdf>

13. A 15% non-implementation rate has been applied to extant planning permissions which have not yet commenced. This is considered appropriate as a matter of planning judgement in the current circumstances. The approach to windfalls remains as set out previously to the examination (see ED140) with the overall allowances for both large and small windfalls reduced proportionately to reflect that another year has passed. The delivery assumptions in the revised trajectory are therefore robust.

Progress upon sites proposed for allocation in the Local Plan

14. Table A of ED178 set out the planning status of proposed allocations in the Plan where permissions or resolutions had been granted. Since the information for that paper was prepared:

- Development has now been **completed** on sites BK1 and RY8;
- Development has **commenced** on sites LG14, LS1 and RY1;
- Outline planning permission has been granted for site RY10; and
- A hybrid application for site RY7 has a resolution to grant planning permission subject to completion of a legal agreement (after 1 April 2020).

15. Proposed site RY5 was deleted at the proposed Main Modifications stage as development had commenced, rendering the proposed site allocation obsolete (MM338). The Council recommends that a consistent approach is taken and the following proposed allocations and their accompanying notations on the policies map are now also deleted through Main Modifications:

- Policy BK1, Land off Cambridge Road, Barkway for 13 homes;
- Policy KB3, Chas Lowe site, London Road, Knebworth for 14 homes;
- Policy LG14, Site at Icknield Way, Letchworth Garden City for 8 homes;
- Policy LG17, Hamonte, Letchworth Garden City for 30 homes;
- Policy LS1, Land at Bedford Road, Lower Stondon for 120 homes;
- Policy RY1, Land west of Ivy Farm, Baldock Road Royston for 279 homes;
- Policy RY2, Land north of Newmarket Road, Royston for 330 homes;
- Policy RY8, Land at Lumen Road, Royston for 14 homes; and
- Policy WH1, Land between Horn Hill and Bendish Lane, Whitwell for 41 homes.

Implications of the revised housing trajectory for infrastructure delivery

16. The Council's Matter 22 statement included an assessment of infrastructure requirements based upon the January 2020 housing trajectory. Given the relatively modest alterations to the overall trajectory (see paragraph 8), any differences from the version previously submitted would be *de minimis* in nature.

Consideration of response to the Inspectors' letter in relation to proposed allocations

17. The response to the Inspectors' letter establishes that the housing requirement for North Hertfordshire's own needs should be amended to 11,600 homes in response to the

updated OAN figures. This consists of approximately 11,450 homes within the Stevenage Housing Market Area (HMA) and 150 homes within the Luton HMA (see paragraph 18 of the response to the Inspectors’ letter).

18. Notwithstanding this change, the Council does not wish to propose any further main modifications or other alterations to the proposed spatial strategy in the submitted Plan other than those suggested in Paragraph 15 above.
19. The Council has consistently sought to provide for its own housing needs as a priority. This principle has been applied across the District as a whole and also within the constituent parts of North Hertfordshire that fall within the Stevenage and Luton HMAs.
20. The revised trajectory suggests approximately 13,250 homes might now be delivered within the Plan period across the District to address North Hertfordshire’s own housing needs. This includes 100 homes from the proposed East of Luton allocations to ensure needs arising from that small part of North Hertfordshire within the Luton HMA are met in full.
21. The delivery of 13,250 homes for North Hertfordshire’s own needs would represent a buffer of approximately 14% over the revised housing requirement for the District of 11,600 homes. This information is summarised in the table below.

Housing delivery for North Hertfordshire’s needs (rounded figures)

	North Hertfordshire	Of which...	
		Within Stevenage HMA	Within Luton HMA
Requirement 2011-2031	11,600	11,450	150
Identified supply 2011-2031	13,250	13,100	150
Surplus / (shortfall)	+1,650	+1,650	0
Buffer	14%	14%	0%

22. The proposed East of Luton allocations have a total capacity of 2,100 homes (Policy SP19). As previously explained to the examination, this accommodates North Hertfordshire’s agreed share of the unmet need from Luton and contributes towards the District’s own identified housing needs within the Luton HMA. The revised trajectory currently assumes that approximately 1,500 homes might be delivered from the East of Luton sites by 2031. This reflects the delays in the examination process and the time required for delivery to commence on this strategic site once the examination’s outcomes are known.
23. As set out above, 100 of the homes to be provided East of Luton are required to meet North Hertfordshire’s own needs arising within the Luton HMA. This would leave a balance of 1,400 homes that are presently anticipated to be delivered by 2031 to address Luton’s unmet housing needs.

24. Adding these elements together provides an overall housing requirement for the Plan of 13,000 homes over period 2011-2031. The total anticipated delivery of approximately 14,650 homes provides an overall buffer of 13% over this requirement:

Housing requirement for North Hertfordshire 2011-2031:	11,600
Delivery for Luton’s unmet needs 2011-2031:	1,400
Total housing requirement 2011-2031:	13,000

Delivery for North Hertfordshire’s needs 2011-2031:	13,250
Delivery for Luton’s unmet needs 2011-2031:	1,400
Total anticipated housing delivery 2011-2031:	14,650

25. NHDC have previously explained to the examination that the buffer is an ‘output’ of the site selection and allocation process and housing delivery assumptions. There has never been a policy decision to pursue a buffer of any particular percentage or size (ED140, p.16, paragraphs 78 and 79).

26. The submitted Plan included a buffer of approximately 6% (NHDC Matter 4 Statement, paragraph 6). As the examination progressed this figure was revised to 7% (NHDC Matter 4 statement, paragraph 7), 4% (ED140, p.16, paragraph 76) and most recently back to 6% (ED178).

27. In the current economic circumstances, and given the further delays in being able to progress delivery of sites presently in the Green Belt, it is considered the increased 13% buffer is a robust response as a matter of planning judgement. It ensures flexibility. It provides greater certainty that the adjusted housing requirement will be met. It also provides greater surety that the Plan will continue to demonstrate a five-year housing land supply over its lifetime and that the requirements of the Housing Delivery Test will also be met (see below).

28. At the time of writing the full extent of the short-, medium- and long-term impacts of the COVID-19 pandemic upon the development industry and the housing market are unknown due to their unprecedented nature. The figures presented are best estimate based upon robust data sources and, where appropriate, informal liaison with site owners and promoters. Social and economic impacts may ultimately prove more severe than anticipated, adversely impacting upon the assumptions made at this point. Equally, economic recovery may take hold more quickly. Notwithstanding this point, the Council retains its ambition – set out in ED178 – to accelerate delivery on key strategic sites where possible and any demonstrable uplifts will be factored into the proposed early review of the Plan.

29. Previous evidence, including ED178, has outlined the difficulties in achieving and maintaining a five-year supply in North Hertfordshire. This is exacerbated by the backlog

that has accrued since the start of the Plan period in 2011. It is therefore prudent to provide an element of choice and flexibility. Constraining allocations too closely to the revised requirement would result in a failure to meet five-year land supply and / or Housing Delivery Test requirements. This is a significant risk and this approach is not recommended.

30. It is anticipated that delivery on several of the proposed strategic sites will now continue beyond 2031. Any future review of this Plan will, under current Government guidance, need to have regard to the Standard Method for calculating housing need as set out in NPPF2 and associated practice guidance. It is clear from the indicative standard method figures in ED171 that housing need in North Hertfordshire and across the whole of the Stevenage and Luton HMAs will continue to be an acute issue in any plan review. Releasing these sites from the Green Belt now will, in addition to making a major contribution to the revised housing requirement, provide greater surety of supply when future plan reviews are undertaken.
31. Continuing to identify the proposed North of Baldock and East of Luton allocations in full, along with those other strategic sites where some delivery is now anticipated to occur beyond 2031, allows for any future schemes to be considered holistically, provides certainty for future plan reviews and reduces the risk of further Green Belt alterations being required at the end of the Plan period, consistent with NPPF Paragraphs 83 and 85.
32. The example of *Guildford* demonstrates that Councils can lawfully propose a substantive buffer over and above the housing requirement³. This case similarly demonstrates that providing choice and flexibility over and above the housing requirement can be a contributory factor to the 'exceptional circumstances' required to release land from the Green Belt. The 13% buffer proposed by NHDC, when considered against the revised housing requirement for the District, is substantially smaller than that proposed by Guildford (approximately 40% over the housing requirement) but many of the principles in that case are equally applicable here.

Implications for five-year housing land supply and the approach to delivering the housing requirement

33. It is a key requirement of national policy that the Plan establishes a five-year housing land supply. The Council is mindful that, once adopted, performance against the housing requirements will be judged using the tests of deliverability in NPPF2 as well as the Housing Delivery Test.
34. To date, the Council has proposed a 'stepped' approach to meeting the housing requirement and use of the *Liverpool* method in calculating five-year supply. This spreads any backlog in delivery across the remainder of the Plan period.

³ Compton Parish Council & Ors v Guildford Borough Council & Anor [2019] EWHC 3242 (Admin) (04 December 2019), <https://www.bailii.org/ew/cases/EWHC/Admin/2019/3242.html>, accessed July 2020

35. These approaches are recommended only where Councils cannot deliver a more immediate response. In light of the reduced OAHN, the Council has considered whether a flat target and / or the *Sedgefield* method of calculating five-year supply might now be a realistic option. The detailed figures and reasoning underpinning this commentary are provided in Appendices B and C.

36. As with ED178, a range of scenarios have been considered. Notwithstanding the proposed reduction in the housing requirement to 13,000 homes, it remains the case that delivery since 2011 has fallen below the annualised rate of 650 homes per year every year since 2011.

37. On a flat trajectory, there would be an accrued backlog of more than 3,000 homes at 1 April 2020. A *Sedgefield* approach would require this to be addressed in full within the next five years with an additional 20% buffer reflecting the persistent under-delivery of new homes. Together, these measures lead to a five-year requirement of more than 7,500 homes. Even in supportive economic conditions, sustained delivery of more than 1,500 homes per year over a five-year period (or longer) is not considered credible.

38. The amount of development now anticipated in the five-year periods from 1 April 2019 and 1 April 2020 has reduced by approximately 300 homes compared to the figures set out in the Council's Matter 22 statement, as shown in the table below.

Base date	Anticipated supply in five-year period	
	ED178	Updated trajectory
1 April 2019	3,359	3,027
1 April 2020	4,425	4,146

39. For the reasons set out in ED178, any suspension of the examination to consider alternate or additional sites is not a viable option. It is therefore necessary to construct the housing delivery requirements of the Plan in a way which reflect the anticipated delivery trajectory.

40. The Council's proposed approach broadly reflects that set out in ED178. Minor adjustments are proposed to reflect current circumstances and the reduced housing requirement:

- The Council continues to propose a three-stepped approach to housing delivery utilising the *Liverpool* approach to backlog as the only achievable way forward:
- Step 1 would continue to set a target of 350 homes from 2011 with this target now running until 2020 rather than 2019. The reasons for this are as per ED178;
- Step 2 would set the same target of 500 homes, but for the next four years from 2020 (rather than five years from 2019 in ED178); while

- Step 3 would set a slightly lower target of 1,120 homes per year (vs. 1,250 in ED178) to deliver the balance of the overall requirement of 13,000 by 2031⁴.

41. As per ED178, this approach would represent a step-change to housing delivery in the next five-years and enable demonstration of a five-year supply with a 20% buffer and a reasonable 'margin of error' in the current circumstances. Based upon the anticipated delivery in the trajectory, the Council would continue to be able to demonstrate a five-year supply in future years pending the proposed early review. It would also maintain delivery above the Housing Delivery Test's 75% threshold, below which the 'presumption in favour of sustainable development' applies.

Implications of the revised housing trajectory for relevant policies and supporting text

42. Given that these matters remain to be examined, detailed proposed modifications have not been presented at this stage. However, the approaches set out in this paper are likely to require (further) modifications to:
- Policy SP8 and its supporting text;
 - Policies SP14, SP15, SP16 & SP19 and their supporting text insofar as it relates to the amount of development now anticipated to be delivered on these proposed strategic sites by 2031;
 - The proposed local housing allocations and housing figures presented by individual settlement in Chapter 13; and
 - Chapter 14 in relation to monitoring arrangements and the housing trajectory

Conclusion

43. The Council has updated its housing trajectory to reflect the updated OAHN, the latest monitoring as at 1 April 2020 and the anticipated impacts of COVID-19 on future housing delivery. For the reasons set out in this paper, the Council recommends that all of the proposed allocations in the Plan are retained and that the revised housing requirement and supply trajectory is adopted.
44. This would necessitate further modifications to those previously consulted upon and / or suggested to the examination. These can be drafted once these matters have been considered at examination by the Inspector.
45. The Council requests that, on the basis of the written material submitted to date or following the resumed hearings, the Inspector provides a clear indication as to which (if any) of the proposed allocations he may be minded to find 'unsound' and remove from the Plan or otherwise alter along with any further adjustments to the housing requirement in response to the demographic evidence presented.
46. This will enable relevant modifications relating to the housing requirement and housing delivery to be appropriately and accurately drafted. This approach would also allow

⁴ The stepped figures sum to a total requirement of 12,990 over the period 2011-2031 as each step is rounded to the nearest ten units.

decision-makers to correctly apply weight to the emerging Plan in line with Paragraph 48 of 'NPPF2', particularly where any scheme places reliance upon its emerging policy status. This is particularly important as, until such time as the Plan progresses, the Council can presently only demonstrate a 2.2-year land supply for decision-making purposes. This reflects the fact that proposed allocations in an emerging Plan fall outside the examples of deliverable sites contained in Annex 2 of NPPF2 and their inclusion may be difficult to justify in a planning decision or Section 78 planning appeal.

Appendix A: Revised housing trajectory as at 1 April 2020

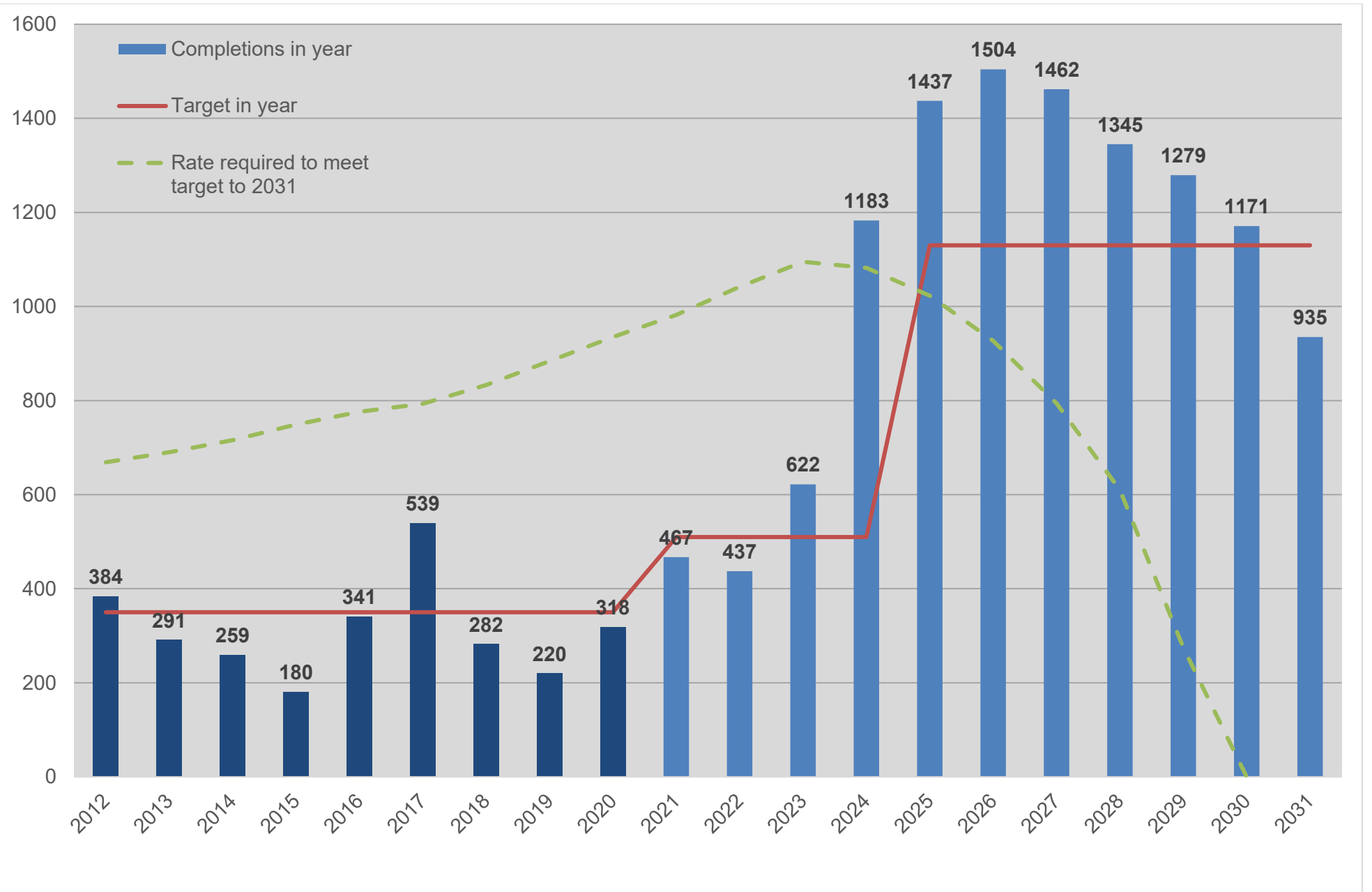
Monitoring period (1 April to 31 March)	Current delivery assumptions (July 2020)	Previous delivery assumptions			
		ED178 (Dec 2019)	ED140 (Apr 2018)	ED3 (Jul 2017)	LP1 (Oct 2016)
2011-12	384	384	384	384	384
2012-13	291	291	291	291	291
2013-14	259	259	259	259	259
2014-15	180	180	180	180	180
2015-16	341	341	341	341	341
2016-17	539	539	539	539	413
2017-18	282	282	339	339	448
2018-19	220	220	367	433	608
2019-20	318	401	617	926	936
2020-21	467	494	1,384	1,361	1,329
2021-22	437	474	1,541	1,353	1,362
2022-23	622	780	1,443	1,361	1,280
2023-24	1,183	1,205	1,417	1,257	1,229
2024-25	1,437	1,468	1,280	1,270	1,236
2025-26	1,504	1,420	1,160	1,329	1,265
2026-27	1,462	1,378	1,051	1,151	1,213
2027-28	1,345	1,349	1,000	1,107	1,164
2028-29	1,279	1,299	983	1,123	1,058
2029-30	1,171	1,102	998	1,073	997
2030-31	935	975	955	984	909
Total 2011-2031	14,656	14,841	16,529	17,061	16,902

Actual / known completions shown in bold

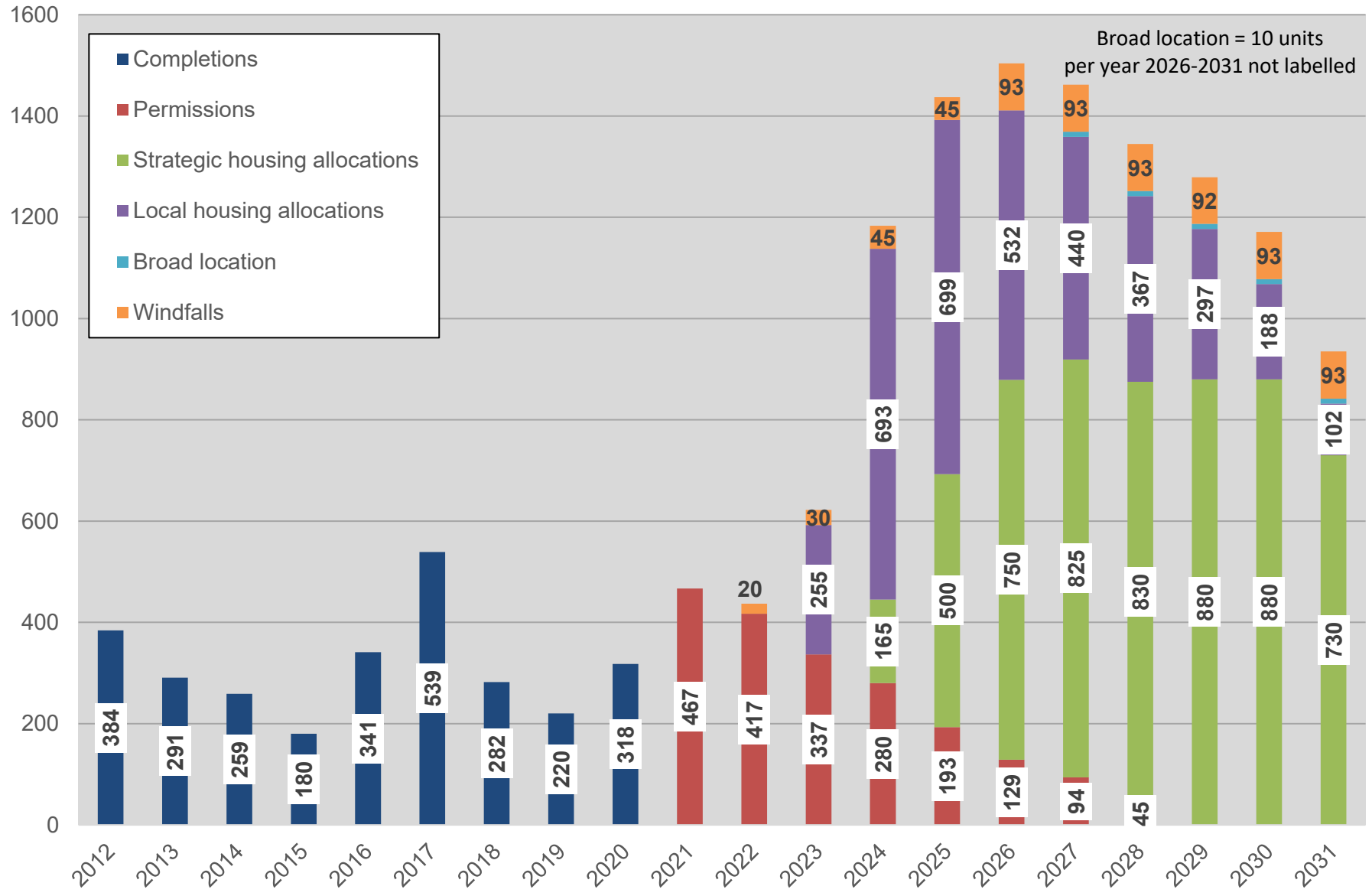
Revised proposed Housing Trajectory - base date 1 April 2020

Plan ref	Address	Town / parish	Area (ha)	Homes	Monitoring year (1 April - 31 March)																	Total to 2031	Beyond 2031				
					2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027			2028	2029	2030	2031
	Completions 1 April 2011 - 31 March 2020	Unspecified		2814	384	291	259	180	341	539	282	220	318													2,814	
	Permissions at 1 April 2020																										
RY10	Land south of Newmarket Road	Royston		325										20	50	55	55	50	50	45						325	
RY1	Land west of Royston and north of Baldock Road	Royston		279										20	55	55	60	55	34							279	
LS1	Land at Ramerick	Lower Stondon (Ickleford)		144										30	50	50	14									144	
RY2	Land East Of Garden Walk And North Of Newmarket Road	Royston		139												5	45	45	44							139	
RY2	Land East Of Garden Walk And North Of Newmarket Road	Royston		108											26	42	40									108	
RY2	Land East Of Garden Walk And North Of Newmarket Road	Royston		49										30	19											49	
	Land Adjacent To Elm Tree Farm,	Pirton		41										25	16											41	
LG17	Land at Hamonte	Letchworth		71										71												71	
	Oddsey Health Club	Knebworth		70												23	24	23								70	
	Garden Square Shopping Centre, Leys Avenue	Letchworth		47										47												47	
LG9	Site Of Former Lannock Primary School	Letchworth		44												13	18	13								44	
WH2	Land south of Bendish Lane	Whitwell		41										21	20											41	
RY4 (part)	Land north of Lindsay Close	Royston		39											12	15	12									39	
AS1	Land Rear Of 4-14, Claybush Road	Ashwell		30												9	12	9								30	
	Hitchin Cricket Ground, Lucas Lane	Hitchin		3										3												3	
	Land On The North East Side of Priors Hill	Pirton		23										12	11											23	
	65 Bury Mead Road	Hitchin		21											6	9	6									21	
	Dorchester House, Station Parade	Letchworth		18										7	6	3	2									18	
	Blackett Ord Court, Stamford Avenue	Royston		17										7	6	3	1									17	
	Land South Of 1A Lower Gower Road	Royston		16										6	6	2	2									16	
	Block B, Latchmore Court	Hitchin		13										5	5	2	1									13	
	Legion House, Paynes Park	Hitchin		12										5	4	2	1									12	
	St Michaels House, Norton Way South	Letchworth		12										5	4	2	1									12	
	Station House, Station Approach	Knebworth		10										4	4	2	0									10	
	The Station, Station Approach	Knebworth		10										4	4	2	0									10	
	Hamilton Billiards, Park Lane	Knebworth		10										4	4	2	0									10	
	Roysia House	Royston		10										4	4	2	0									10	
	Small sites (<10 unit) - Baldock	Baldock		34										14	12	5	3									34	
	Small sites (<10 unit) - Hitchin	Hitchin		105										42	37	16	10									105	
	Small sites (<10 unit) - Letchworth	Letchworth		50										20	18	8	4									50	
	Small sites (<10 unit) - Royston	Royston		50										20	18	8	4									50	
	Small sites (<10 unit) - Villages	Unspecified		234										94	82	35	23									234	
	<i>Non implementation</i>			-113										-33	-32	-23	-18	-7								-113	
	Proposed local plan sites																										
AS1	Land west of Claybush Road	Ashwell	1.7	0																							
BA1	North of Baldock	Baldock	142.4	2800														100	150	200	200	250	250	250	1,400	1,400	
BA2	Land off Clothall Road (Clothall parish)	Baldock	6.8	200														45	35	30	30	30	30		200		
BA3	South of Clothall Common (Clothall parish)	Baldock	13.3	245														25	40	60	60	60			245		
BA4	East of Clothall Common	Baldock	3.9	50														25	25						50		
BA5	Land off Yeomanry Drive	Baldock	0.7	25														12	13						25		
BA6	Land at Icknield Way	Baldock	0.5	0																							
BA7	Rear of Clare Crescent	Baldock	1.0	20															10	10					20		
BA11	Deans Yard, South Road	Baldock	0.3	20																	20				20		
BK1	Land off Cambridge Road	Barkway	0.7	0																							
BK2	Land off Windmill Close	Barkway	1.2	20																						20	
BK3	Land between Cambridge Road & Royston Road	Barkway	7.8	140														10	10						140		
CD1	Land south of Cowards Lane	Codicote	3.6	73														35	35	35	35				73		
CD2	Codicote Garden Centre, High Street (south)	Codicote	2.7	54												24	30								54		
CD3	Land north east of The Close	Codicote	2.4	48															s	24	24				48		
CD5	Land south of Heath Lane	Codicote	11.2	140												35	35	35	35						140		
GR1	Land at Milksey Lane (north)	Graveley	1.9	8												8									8		
HT1	Higover Farm, Stotfold Road	Hitchin	38.9	700														100	100	100	100	100	100	100	700		
HT2	Land north of Pound Farm, London Road (St Ippolyts parish)	Hitchin	3.4	84														28	28	28					84		
HT3	Land south of Oughtonhead Lane	Hitchin	1.9	46															23	23					46		
HT5	Land at junction of Grays Lane & Lucas Lane	Hitchin	0.6	16															16						16		
HT6	Land at junction of Grays Lane and Crow Furlong	Hitchin	2.1	53														30	23						53		
HT8	Industrial area, Cooks Way	Hitchin	0.7	12																				12		12	
HT10	Former B&Q	Hitchin	0.7	60																		60			60		
IC1	Land off Duncots Close	Ickleford	0.4	9																				9	9		
IC2	Burford Grange, Bedford Road	Ickleford	2.4	40												20	20								40		
IC3	Land at Bedford Road	Ickleford	9.6	150														50	50	50					150		
KM3	Land north of High Street	Kimpton	0.7	13																				13	13		
KW1	Allotments west of The Heath, Breachwood Green	King's Walden	0.8	16																				16	16		
KB1	Land at Deards End	Knebworth	12.1	200															40	40	40	40	40		200		
KB2	Land at Gipsy Lane	Knebworth	15.3	184																							

Plan ref	Address	Town / parish	Area (ha)	Homes	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total to	Beyond		
					2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2031	2031	2031	2031
LG18	Former Depot, Icknield Way	Letchworth	0.9	55													30	25								55		
LS1	Land at Ramerick	Lower Standon (Ickleford)	7.1	0	Permission granted prior to 1 April 2020. Included in supply figures above to prevent double counting; Allocation proposed for deletion																							
EL1	Luton East (west)	Luton (adjoining)	69.3	1050													65	130	130	130	100	100	100	100		855	195	
EL2	Luton East (east)	Luton (adjoining)	15.1	350																	35	35	35	35		140	210	
EL3	Land north east of Luton	Luton (adjoining)	33.8	700														70	70	70	70	70	70	70		490	210	
PR1	Land east of Butchers Lane	Preston	1.1	21																	21					21		
RD1	Land at Blacksmiths Lane	Reed	1.1	22																				22		22		
RY1	Land west of Ivy Farm, Baldock	Royston	15.5	0	Permission granted prior to 1 April 2020. Included in supply figures above to prevent double counting; Allocation proposed for deletion																							
RY2	Land north of Newmarket Road	Royston		0	Permission granted prior to 1 April 2020. Included in supply figures above to prevent double counting; Allocation proposed for deletion																							
RY4	Land north of Lindsay Close	Royston	4.3	61																	21	20	20			61		
RY7	Anglian Business Park, Orchard Road	Royston	1.2	60													20	20	20							60		
RY8	Land at Lumen Road	Royston	0.3	0	Permission granted prior to 1 April 2020. Included in supply figures above to prevent double counting; Allocation proposed for deletion																							
RY10	Land south of Newmarket Road	Royston	14.3	0	Permission granted prior to 1 April 2020. Included in supply figures above to prevent double counting																							
RY11	Land at Barkway Road	Royston	0.9	18																			9	9		18		
SI1	Land south of Waterdell Lane (north)	St Ippolyts	2.9	40																	20	20				40		
SI2	Land south of Stevenage Road	St Ippolyts	1.2	12													12									12		
WH2	Land between Horn Hill and Bendish Lane, Whitwell	St Paul's Walden	5.9	0	Permission granted prior to 1 April 2020. Included in supply figures above to prevent double counting; Allocation proposed for deletion																							
GA1	Stevenage North East (Roundwood)	Stevenage (adjoining)	10.8	330													30	60	60	60	60	60				330		
GA2	Land off Mendip Way, Great Ashby	Stevenage (adjoining)	49.1	600																	50	100	100	100	100	50	600	
NS1	Stevenage North	Stevenage (adjoining)	43.2	900																	50	100	125	125	125	125	775	125
TH1	Police Row (east)	Therfield	1.3	12																			12			12		
WE1	Land off Hitchin Road	Weston	2.1	40													25	15								40		
WY1	Land south of Little Wymondley	Wymondley	14.3	300																	50	50	50	50	50	300		
Broad locations and windfalls																												
	Broad locations (1) - Letchworth Town Centre	Letchworth		50																	10	10	10	10	10		50	
	Windfalls (1) - small sites	Unspecified		440										20	30	45	45	50	50	50	50	50	50	50		440		
	Windfalls (2) - large sites	Unspecified		257														43	43	43	42	43	43			257		
Total				671.15	17096	384	291	259	180	341	539	282	220	318	467	437	622	1,183	1,437	1,504	1,462	1,345	1,279	1,171	935	14,656		
Cumulative total since 2011						384	675	934	1,114	1,455	1,994	2,276	2,496	2,814	3,281	3,718	4,340	5,523	6,960	8,464	9,926	11,271	12,550	13,721	14,656			



Housing trajectory: Components of housing supply 2011-2031



Appendix B: Consideration of five-year supply scenarios

Approach considered		Commentary based upon revised trajectory
Housing requirement	Trajectory	
Amended requirement of 13,000 homes to reflect 2018-based OAN for NHDC and unmet needs from Luton	Non-stepped approach (650 homes per year 2011-2031)	No prospect of demonstrating a five-year supply under <i>Sedgefield</i> approach until 2025 at the earliest. Measure of 2.7 years at 1 April 2020. <i>Liverpool</i> identifies potential supply of 5.0 years at 2022 but not at point of examination / adoption.
	Two-Stepped approach broadly based upon IMR 1 (400 homes per year 2011-2021; 900 homes per year 2021-2031)	<i>Sedgefield</i> does not demonstrate five-year supply until 2024 with measure of 3.6 years at 1 April 2020. <i>Liverpool</i> as above with 4.0 year supply at 1 April 2020.
	Three-stepped approach (350 homes per year 2011-2020; 500 homes per year 2020-2024; 1,120 homes per year 2024-2031)	This approach would set a target of 350 homes per year for the period to 31 March 2020 broadly reflecting actual delivery. The remaining plan period would be split. A target of 500 homes per year would apply for the next four five years, increasing to 1,120 for the remainder of the Plan period. This option provides the only realistic prospect of demonstrating a robust five-year supply at the point of assessment / adoption with a 5.3 year supply under the <i>Liverpool</i> approach at 1 April 2020. Five-year supply would hold at between 5.2 years and 5.6 years until 2024. Housing Delivery Test results would not fall below threshold of 75% in NPPF2.

Appendix C: Five-year supply and indicative Housing Delivery Test calculations

(Actual figures at 1 April 2020. Subsequent years assume housing delivery as per App. A)

Scenario 1:

Housing requirement: 13,000; Non-stepped approach (650 homes per year 2011-2031)

	Five-year supply (Sedgefield)	1 April 2020	1 April 2021	1 April 2022	1 April 2023	1 April 2024
A	Cumulative completions since 1 April 2011	2,814	3,281	3,718	4,340	5,523
B	Cumulative target since 1 April 2011	5,850	6,500	7,150	7,800	8,450
C	Shortfall against target as at 1 April (A – C)	-3,036	-3,219	-3,432	-3,460	-2,927
D	Target for next five years	3,250	3,250	3,250	3,250	3,250
E	Shortfall to be addressed in five year period (Sedgefield method) (-C)	3,036	3,219	3,432	3,460	2,927
F	Buffer to be applied	+20%	+20%	+20%	+20%	+20%
G	Total five year requirement (D + E) * F	7,543	7,763	8,018	8,052	7,412
H	Projected delivery in five-year period	4,146	5,183	6,208	6,931	7,027
I	Years land supply (H / G) * 5	2.7	3.3	3.9	4.3	4.7

	Five-year supply (Liverpool)	1 April 2020	1 April 2021	1 April 2022	1 April 2023	1 April 2024
A	Cumulative completions since 1 April 2011	2,814	3,281	3,718	4,340	5,523
B	Cumulative target since 1 April 2011	5,850	6,500	7,150	7,800	8,450
C	Shortfall against target as at 1 April	-3,036	-3,219	-3,432	-3,460	-2,927
D	Target for next five years	3,250	3,250	3,250	3,250	3,250
E	Shortfall to be addressed in five year period (Liverpool method) (-C annualised * 5)	1,380	1,610	1,907	2,163	2,091
F	Buffer to be applied	+20%	+20%	+20%	+20%	+20%
G	Total five year requirement (D + E) * F	5,556	5,831	6,188	6,495	6,409
H	Projected delivery in five-year period	4,146	5,183	6,208	6,931	7,027
I	Years land supply (H / G) * 5	3.7	4.4	5.0	5.3	5.5

Scenario 2:

Housing requirement: 13,000

Two-stepped approach based upon IMR1 (400 homes per year 2011-2021; 900 homes per year 2021-2031)

	Five-year supply (Sedgefield)	1 April 2020	1 April 2021	1 April 2022	1 April 2023	1 April 2024
A	Cumulative completions since 1 April 2011	2,814	3,281	3,718	4,340	5,523
B	Cumulative target since 1 April 2011	3,600	4,000	4,900	5,800	6,700
C	Shortfall against target as at 1 April (A – C)	-786	-719	-1,182	-1,460	-1,177
D	Target for next five years	3,500	4,000	4,500	4,500	4,500
E	Shortfall to be addressed in five year period (Sedgefield method) (-C)	786	719	1,182	1,460	1,177
F	Buffer to be applied	+20%	+20%	+20%	+20%	+20%
G	Total five year requirement (D + E) * F	5,743	6,263	6,818	7,152	6,812
H	Projected delivery in five-year period	4,146	5,183	6,208	6,931	7,027
I	Years land supply (H / G) * 5	3.6	4.1	4.6	4.8	5.2

	Five-year supply (Liverpool)	1 April 2020	1 April 2021	1 April 2022	1 April 2023	1 April 2024
A	Cumulative completions since 1 April 2011	2,814	3,281	3,718	4,340	5,523
B	Cumulative target since 1 April 2011	3,600	4,000	4,900	5,800	6,700
C	Shortfall against target as at 1 April	-786	-719	-1,182	-1,460	-1,177
D	Target for next five years	3,500	4,000	4,500	4,500	4,500
E	Shortfall to be addressed in five year period (Liverpool method) (-C annualised * 5)	357	360	657	913	841
F	Buffer to be applied	+20%	+20%	+20%	+20%	+20%
G	Total five year requirement (D + E) * F	5,229	5,831	6,188	6,495	6,409
H	Projected delivery in five-year period	4,146	5,183	6,208	6,931	7,027
I	Years land supply (H / G) * 5	4.0	4.4	5.0	5.3	5.5

Scenario 3:

Housing requirement: 13,000

Three-stepped approach (350 homes per year 2011-2020; 500 homes per year 2020-2024; 1,120 homes per year 2024-2031)

	Five-year supply (Sedgefield)	1 April 2020	1 April 2021	1 April 2022	1 April 2023	1 April 2024
A	Cumulative completions since 1 April 2011	2,814	3,281	3,718	4,340	5,523
B	Cumulative target since 1 April 2011	3,150	3,650	4,150	4,650	5,150
C	Shortfall against target as at 1 April (A – C)	-336	-369	-432	-310	+373
D	Target for next five years	3,120	3,740	4,360	4,980	5,600
E	Shortfall to be addressed in five year period (Sedgefield method) (-C)	336	369	432	310	n/a
F	Buffer to be applied	+20%	+20%	+20%	+20%	+20%
G	Total five year requirement (D + E) * F	4,147	4,931	5,750	6,348	6,720
H	Projected delivery in five-year period	4,146	5,183	6,208	6,931	7,027
I	Years land supply (H / G) * 5	5.00	5.26	5.40	5.46	5.23

	Five-year supply (Liverpool) RECOMMENDED APPROACH	1 April 2020	1 April 2021	1 April 2022	1 April 2023	1 April 2024
A	Cumulative completions since 1 April 2011	2,814	3,281	3,718	4,340	5,523
B	Cumulative target since 1 April 2011	3,150	3,650	4,150	4,650	5,150
C	Shortfall against target as at 1 April	-336	-369	-432	-310	+373
D	Target for next five years	3,120	3,740	4,360	4,980	5,600
E	Shortfall to be addressed in five year period (Liverpool method) (-C annualised * 5)	153	185	240	194	n/a
F	Buffer to be applied	+20%	+20%	+20%	+20%	+20%
G	Total five year requirement (D + E) * F	3927	4709	5520	6209	6720
H	Projected delivery in five-year period	4,146	5,183	6,208	6,931	7,027
I	Years land supply (H / G) * 5	5.28	5.50	5.62	5.58	5.23

Indicative Housing Delivery Test results

Scenario		1 April 2020	1 April 2021	1 April 2022	1 April 2023	1 April 2024
	Completions in three years to...	820	1,005	1,222	1,526	2,242
1	Requirement over three years to...	1,950	1,950	1,950	1,950	1,950
	Housing Delivery Test %	42%	52%	63%	78%	115%
2	Requirement over three years to...	1,200	1,200	1,700	2,200	2,700
	Housing Delivery Test %	68%	84%	72%	69%	83%
3	Requirement over three years to...	1,050	1,200	1,350	1,500	1,500
	Housing Delivery Test %	78%	84%	91%	102%	149%