

City of York Local Plan Examination
Hearing Statement on behalf of Defence
Infrastructure Organisation

Matter 5: Housing Land Supply

March 2022

Report Title: York Local Plan Examination – Phase 2 Hearing Statement – Matter 5

Prepared by: Craig Alsbury and Tim Collard

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For and on behalf of Avison Young (UK) Limited

1. Matter 5: Housing Land Supply

5.1 Does Policy SS1, and the Plan as a whole, provide an appropriate policy framework for the delivery of housing over the Plan period? If not, how is this to be addressed?

- 1.1 On the basis of our assessment of the Council's housing land supply (see below), the Plan cannot be said to provide an appropriate policy framework for the delivery of adequate housing over the plan period. The only way that the issues highlighted in this Statement can be satisfactorily addressed is with the allocation of additional land for housing development.

5.2 We understand through the latest housing trajectory update [EX/CYC/69] that the sources of housing land supply underpinning the Plan are as follows:

- **8,642 dwellings on allocated new strategic housing sites (ST)**
- **1,703 dwellings on allocated housing sites (H)**
- **1,853 dwellings (commitments – unimplemented permissions as at 1 April 2021)**
- **3,113 dwellings (cumulative completions between 2017-2021)**
- **planning permission or resolution to grant planning permission as at 1 April 2021)**
- **720 dwellings in communal establishments /student accommodation**
- **1,764 dwellings on windfall sites (from 2024/25 – 2032/33 @196 per annum) to 2032/33**

This provides a total housing supply of a minimum of 17,795 dwellings during the Plan period. Is this correct?

- 1.2 The Inspectors are correct that the above components are combined to calculate the total amount of new homes that are provided for in the Local Plan. However, there are a number of errors in the Council's trajectory as follows:
- a) H3 Burnholme School – the trajectory indicates that this site will deliver 72 homes but outline planning permission was granted for 83 dwellings on 14 October 2021 (20/01916/OUTM);
 - b) H5 Lowfield School – the Council indicates that the capacity of this site is 165 homes (although the total number of homes shown in the trajectory is 162) but full planning permissions have been granted for 140 dwellings (17/02428/FULM – 21 August 2018) and 19 dwellings (18/02925/FULM – 25 March 2019), giving a total of 159 dwellings;
 - c) H29 Land at Moor Lane Copmanthorpe – the trajectory indicates that this site will deliver 88 dwellings but an application for full planning permission for 91 dwellings was submitted to the Council in 2019 (19/00602/FULM);
 - d) H31 Eastfield Lane, Dunnington – the trajectory indicates that this site will deliver 76 homes but the Council resolved to grant full planning permission for 78 dwellings on 7 October 2021 (20/01626/FULM);

- e) H38 Land RO Rufforth Primary School, Rufforth – the trajectory indicates that this site will deliver 33 homes but an application for full planning permission for 21 dwellings was submitted in December last year (21/02661/FULM);
- f) H46 Land to the north of Willow Bank and East of Haxby Road, New Earswick – the trajectory indicates that this site will deliver 104 homes but an application for full planning permission for 117 dwellings was submitted in December 2020 (20/02495/FULM).
- 1.3 The trajectory indicates that the Council's 'H Sites' will deliver 1,706 dwellings. However, when the above errors are corrected, the total reads 1,717 dwellings.

5.3 We note that the windfall allowance per annum has been increased from 169 dwellings per annum in previous housing trajectories (e.g. [EX/CYC/17]) to 196 dwellings per annum in the 2021 Housing Trajectory [CYC/EX/69]. Is this correct? If so, what is the basis and justification for this change in the windfall allowance?

- 1.4 Yes, the windfall allowance has been increased from 169 to 196. We have seen no explanation for this increase and no evidence that justifies it. The adjustment that the Council has made has added 243 homes to its supply.

5.4 Is the estimate of windfall numbers identified by the Plan appropriate and realistic? Is the approach consistent with the Framework? Given the time that has passed since the Plan was submitted, is the identified windfall allowance in the Plan (169 dwellings per annum) still appropriate, realistic and justified?

- 1.5 The NPPF states that:

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. (paragraph 48)

- 1.6 The Council appears to have based its assumptions as regards windfalls on past trends (focussing on data from the past 10 years). In this period, the number of homes delivered through windfall developments has varied. There have been years in which the total number of windfalls has exceeded 169 and years in which the total has been less. But regardless of the numbers, there are several compelling reasons why, in York, it is not appropriate to base future windfall forecasts on past trends. These include the fact that:
- the Council hasn't had an up-to-date plan since 1954. As a consequence, it will naturally have seen a higher number of windfall developments compared to an Authority with an adequate supply of allocated sites. It doesn't follow that historic levels of windfalls will continue to be seen when the Local Plan is adopted and proposed housing allocations are confirmed;
 - because the City is surrounded by Green Belt, the Council is compelled to exhaust the capacity of its urban areas when allocating land for development in this Plan. This must mean that future windfall opportunities will be more scarce than they have been historically;

- the number of homes that Authorities have seen delivered via the conversion of Office buildings will reduce over time and the number of outmoded buildings in the market will also reduce; and
- there are only sites for 717 dwellings on York's Brownfield Land Register (2021) that are not already proposed to be allocated. The total windfall allowance being made by the Council (in the Plan period) currently amounts to 1,764 which is far in excess of the capacity of the sites that appear in the Brownfield Register.

- 1.7 In our view, the above factors indicate that: (i) there is no compelling evidence that indicates that it is appropriate for the Council to include a windfall allowance in the next 5 years and (ii) there is no robust evidence which indicates that an allowance of either 169 or 196 dwellings per annum is appropriate and realistic.
- 1.8 If a windfall allowance is to be made in the Council's housing trajectory, this should not appear sooner than 2028 / 2029 (5 years after adoption) and it should not be as high as 169 dwellings per annum (let alone 196 dwellings per annum). Having regard to the factors listed above, it seems to DIO that it would be more appropriate and realistic for the Council to make a windfall allowance of no more than 120 dwellings per annum from 2027 or 2028 onwards. A figure of 120 would reflect the lower of the rates achieved historically, at a time before office to residential conversions were allowed as permitted development, and is likely to better reflect the scale of opportunity for windfalls that remains, after the Council has exhausted its urban capacity for the purposes of preparing this Plan.
- 1.9 If the windfall allowance were to be reduced to 120dpa, and the point at which it is inserted into the trajectory deferred to 2028, the total housing supply shown in the trajectory for the period 2021 to 2033 would reduce by 1,164 homes. Over the period to 2038, the reduction would increase to 1,544.

5.5 Are the suggested rates of planned housing development realistic and achievable when considered in the context of the past completion rates? Where is the evidence to support the approach adopted?

- 1.10 In the majority of cases the council appears to be making reasonable and appropriate assumptions about the number of homes that are likely to be delivered each year across the various sites in its trajectory. However, there are some obvious issues which will need to be interrogated during the Hearing Session.
- 1.11 The standout issue arises in respect of ST15 (Elvington Lane) which the Council assumes will deliver 210 dwellings per annum for a two-year period from 2030 and then 280 per annum during each of the following 6 years. So far as we can tell, such rates have never before been achieved in the York administrative, and we have seen no evidence to suggest that such rates are capable of being achieved on a single site in the future, even with the assistance of multiple housebuilders / sales outlets. It is noteworthy that, in the peak years assumed in respect of ST15, this one development is forecast to account for up to circa 30% of the Council's housing delivery. Yet there is no evidence of the Council have considered the ability of the market to absorb this level of supply from a single location. In the absence of clear and compelling evidence justifying the delivery rates assumed in respect of ST15, these should be reduced to more appropriate levels, consistent with other major allocations (i.e. to levels below 200dpa).

5.6 Is the housing trajectory update [EX/CYC/69] realistic? In the context of footnote 11 of the NPPF, does it form an appropriate basis for assessing whether sites are deliverable?

- 1.12 The Council's trajectory contains details of dwellings that have already been delivered (in the period 2017 to 2021) and those that are expected to be delivered in the period 2021 to 2033 and then 2033 to 2038:
- a) on housing allocations of less than 5ha (H Sites);
 - b) on housing allocations larger than 5ha (ST Sites);
 - c) on sites for student accommodation and communal establishments; and
 - d) as windfalls.
- 1.13 For each category of site, the Council forecasts housing delivery in the next 5 years and in the period beyond that.
- 1.14 In order for the Inspectors to conclude that it is appropriate to assume that housing will be delivered in the next 5 years, they must be satisfied that these sites are 'deliverable'. The NPPF provides that 'deliverable' means that they are: housing should be "*available now*", offer a "*suitable location or development now*" and "*be achievable with a realistic prospect that housing will be delivered on the site within 5 years and that development of the site is viable*". The NPPG adds that:
- *for sites that do not involve major development and have planning permission and all sites with detailed planning permission should be considered 'deliverable' until permission expired, unless there is clear evidence that homes will not be delivered within 5 years (i.e. no longer viable, OR there is no longer a demand for the type or units or sites have long term phasing plans) or:*
 - *Where a site has OPP for major development, has been allocated in a development plan, has a grant of permission in principles, or is identified on a brownfield register, should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.*
- 1.15 For sites that are forecast to deliver housing after 5 years, the Inspectors must be satisfied that these are 'developable'. The NPPF states that to be considered developable "*sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged*".
- 1.16 We have examined the sites and categories of development that appear in the Council's trajectory and have identified issues in respect of a number of the assumptions that the Council has made in respect of forecast delivery. For the H and ST Sites, we have provided a short summary of the issues we have identified, and have provided a re-cast trajectory for each of the sites that we have found issues with, in the excel file that is appended to this Statement. The issues that we have identified can be summarised as follows:
- a) of the 35 sites that the Council assumes will deliver housing within 5 years of now (i.e. 2022 to 2027), we have concluded that 19 are not demonstrably deliverable having regard to the tests set by the NPPF and the guidance contained in the NPPG. Accordingly, the earliest that one should assume these sites will deliver new homes is 2027 / 2028 (more than 5 years from this year). Pushing back the forecasts for these sites has impacts for both (i) the number of homes that can reasonably expect to be delivered in the period 2021 – 2027 and (ii) the overall number of homes that can be expected to be delivered in the Plan period;
 - b) insofar as Site ST15 is concerned, the available evidence (including submissions made to the Examination by the site promoter) indicates that (i) there is apparently a fundamental disagreement between the promoter and the Council about the form that this development should take; and (ii) ST15 in its current form, it is not likely to deliver homes until 2029 at the

earliest. The Council assumes that it will begin to deliver housing in 2024 and will deliver 700 homes in the final 3 years of the Plan period. Neither assumption is robust. A correction to the trajectory for ST15 has impacts on the numbers of homes that are likely to be delivered both in the next 5 years and in the plan period as a whole; and

- c) we have made corrections to the total dwelling yield that can be expected from several sites to reflect the most up to date planning application information.

- 1.17 In addition, and as noted above, we have a fundamental concern with the assumptions that the Council has made in respect of windfalls and we have seen no evidence to demonstrate that the Council has made sound assumptions about the delivery of 1,853 homes from non-allocated sites with unimplemented consents
- 1.18 Finally, we consider that the Council has made an error when including in its trajectory past completions and forward commitments in respect of student accommodation. The Council's trajectory includes two sets of housing numbers that it attributes to student accommodation. The first is for completions in the period 2017-2021 and the second is for student accommodation and communal establishments yet to be built. The number of homes assumed in respect of past completions is 186 and the number included in the Council's forward supply is 720. Both, in our opinion, are unreliable and should be removed from the trajectory.
- 1.19 The NPPG provides the following in respect of how student accommodation should be treated in the context of housing land supply:
- All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply based on: the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and / or the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation. This will need to be applied to both communal establishments and to multi bedroom self-contained student flats. Several units of purpose-built student accommodation may be needed to replace a house which may have accommodated several students. Authorities will need to base their calculations on the average number of students living in student only accommodation, using the published census data, and take steps to avoid double-counting. The exception to this approach is studio flats designed for students, graduates or young professionals, which can be counted on a one for one basis. A studio flat is a one-room apartment with kitchen facilities and a separate bathroom that fully functions as an independent dwelling.*
- 1.20 We have not been able to find any document which explains how or why the Council has concluded that 186 homes can be assumed to have been released into the market (or retained in the market) as a consequence of student accommodation developments completed in the period 2017-2021. Moreover, we can find no such information to support the Council's assumptions in respect of its forward supply.
- 1.21 What the Council appears to have done is assume that for every 2.5 student beds that are provided in purpose built student accommodation, either a private dwelling is released into the market or a private dwelling remains in private use (as opposed to being rented to students). Yet it has produced no evidence to suggest that this is what is happening in the market.
- 1.22 In the light of the fact that the majority of purpose built student accommodation appears to be being constructed to satisfy demands arising from an increasing student population, we consider it inappropriate to assume that such accommodation will release rented homes back into the market. It

is possible that by providing more student accommodation, a greater proportion of private family housing could remain in private use, but, again, if the majority of new student accommodation is being constructed to deal with an increase in the size of the student population, its effect on the existing rental market will be very limited indeed. Of course, even if it could reasonably be assumed that the provision of purpose built student accommodation would have a positive effect on the number of private dwellings that there are in the market, the Council should be using a ratio of students / dwelling that more closely resembles what happens in the rental market and it is rare that as few as 2.5 students occupy a single house. If such a ratio is to be used, it would be appropriate in our view to assume 3 or 4 students per dwelling. In that case, one would have to be delivering at least 2,160 to 2,880 student beds in order to free up 720 private homes.

- 1.23 Ultimately, unless and until the Council can produce robust and compelling evidence which demonstrates that it is appropriate to assume that building student accommodation in York either releases homes back into the private market, or enables private homes to remain as such, there should be no student accommodation allowance built into the housing trajectory.
- 1.24 When all of the above mentioned adjustments are made to the Council's trajectory (save any adjustment in respect of housing completions from non-allocated unimplemented consents), we conclude that the Plan provides for the delivery of 13,174 new homes in the period to 2033. This is 4,621 less than asserted by the Council and is just 22 dwellings over its stated housing requirement. This is not acceptable. The Council should be planning to deliver more homes than are required in order to provide the flexibility that will enable it to adapt to rapid change in accordance with paragraph 14 of the NPPF. In our view, this means planning to over deliver by at least 15%. On our analysis, the Plan is, without even considering the need for safeguarded land which we have previously said is necessary here, falling a minimum of 1,950 homes short of doing so (even on the basis of the Council's 'need' figure which we say is not sound).

5.7 What is the five-year housing supply requirement upon adoption of the Plan?

- 1.25 This will depend on (i) when one assumes the Plan will be adopted; (ii) what assumptions one makes about completions in the period from 2017 to the point of adoption (including what reasonable assumptions can be made about supply derived from the construction of purpose built student accommodation (see above)); (iii) whether one assumes that the housing requirement is 822dpa or something different (see our Matter 2 Statement and Phase 1 Hearing Statement on housing need); (iv) how one deals with past under-supply (Liverpool v Sedgefield); and (v) whether one applies a buffer to account for previous failings in terms of housing delivery.
- 1.26 Because we do not have completion data for 2021-2022 yet, and because we cannot predict how many homes will be delivered between now and when the Plan is likely to be adopted, a robust calculation cannot be undertaken. However, if we (i) use the Council's past completions data (including its figures for student accommodation); (ii) use the Council's forecast completions data for student accommodation and non-allocated unimplemented consents; (iii) use our forecast completions data for the H and ST sites; (iv) we assume that the Local Plan will be adopted in, say, March 2023; and (v) we apply a 20% buffer to reflect past under performance; the calculation would be as follows:
- Requirement: 5,287 (822 x 5 + 296 (shortfall) + 20% buffer) (or 1,057 dpa)
 - Supply for the period 2023 – 2028 (taken from AY Trajectory): 4,739
 - Supply in Years: 4.48

Note: shortfall is calculated as follows: completions 2017-2021 (3,113) + forecast completions for 2021-2023 (as per above listed assumptions) (1,523) – requirement 2017-2023 (822 x 6 = 4,932) = -296

1.27 If we remove from the past and forecast completions the student accommodation data, the calculation would be as follows:

- Requirement: 6,273 (822 x 5 + 1,134 (shortfall) + 20% buffer) (or 1,255 dpa)
- Supply for the period 2023 – 2028 (taken from AY Trajectory): 4,671
- Supply in Years: 3.72

Note: shortfall is calculated as follows: completions 2017-2021 (2,927) + forecast completions for 2021-2023 (871) – requirement 2017-2023 (822 x 6 = 4,932) = -1,134

5.8 Will the Council be able to demonstrate a rolling five-year housing land supply upon adoption of the Plan?

1.28 We will need to comment on this when the trajectory is corrected and the Council runs the calculation, but based on the above analysis, the answer will almost certainly be no.

5.9 The five-year housing supply, as set out in the latest housing trajectory update [EX/CYC/69], includes an allowance for windfall sites – the aforementioned 196 per annum:

a) What is the compelling evidence that such sites have consistently become available in the local area and that they will continue to provide a reliable source of supply?

b) Is the allowance made realistic, having regard to paragraph 48 of the Framework?

1.29 See above.

5.10 Does the five-year housing land supply position, as set out in the updated Housing Trajectory 2021 [EX/CYC/69], present the most up-to-date position? Is it consistent with all other remaining up-to-date housing evidence? If not, how is this to be addressed?

1.30 No, see above.

5.11 Paragraph 5.9 of the submitted Plan identifies that the Council accepts that there has been a persistent under delivery of housing as defined by the NPPF. As such, does the submitted Plan, and any subsequent submitted evidence on meeting housing need and supply, take into account the requirement for a 20% buffer to be applied to the housing supply? Has this buffer been applied to any subsequent update of evidence or proposed modification to the Plan identified?

- 1.31 The Council has applied a 20% buffer to the 5 year land supply calculation that appears at the foot of its trajectory, but it has not ran its calculation from 2022 or from the point at which the Plan is likely to be adopted and has not rolled its land supply calculation forward beyond the first 5 years and so it is not yet possible to tell when the land supply position improves to the point that a 20% buffer will not be required.

5.12 Overall, is there a supply of specific deliverable sites sufficient to provide five years' worth of housing, with an appropriate buffer (moved forward from later in the Plan) to ensure choice and competition in the market for land?

- 1.32 No. See above.

Appendix 1

CYC Trajectory

Appendix 2

AY Trajectory

EX/CYC/69 Detailed housing Trajectory Updated (Housing Requirement 822 dpa/ 790 dpa OAN)		Total	Actual Completions												Post 2038	Notes								
Base Date 1 April 2021			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	2033/34	2034/35	2035/36	2036/37	2037/38	
1. Net housing completions 2017-2021																								
Net housing completion		2927	1296	449	560	622																		
Net Communal Establishment and Student Accommodation Completions		0	0	0	0	0																		
Total		2927	1296	449	560	622																		
2. Housing Allocations Below 5ha (H Sites)																								
H1a&b	Former Gas Works, 24 Heworth Green (National Grid Properties)	607								199	96		312											
H3	Bumholme School	83									35	35	13											
H5	Lowfield School	159							85	71	3													
H7	Bootham Crescent	93							15	35	35	8												
H8	Askham Park & Ride	60											35	25										
H10	The Barbican	187											187											
H20	Former Oakhaven EPH	56											35	21										
H29	Land at Moor Lane Copmanthorpe	91											35	35	21									
H31	Eastfield Lane Dunnington	78							35	35	8													
H38	Land RO Rufforth Primary School Rufforth	21						21																
H39	North of Church Lane Elvington	32											17	15										
H46	Land to the North of Willow Bank and East of Haxby Road, New Earswick	117							35	35	35	12												
H52	Willow House, EPH, 34 Long Close Lane	15									15													
H53	Land at Knapton Village	0																						
H55	Land at Layerthorpe	20											20											
H56	Land at Hull Road	69					69																	
H58	Clifton Without Primary School	25											15	10										
Total		1713					69	0	191	375	227	55	669	106	21	0								
3. Housing Allocations Projected Completions Above 5 ha (ST Sites)																								
ST1a	British Sugar/ Manor School	1100											150	150	150	150	150	150	150	50				
ST1b	Manor School	100											35	35	30									
ST2	Former Civil Service Sports Ground Millfield Lane	266							48	48	48	48	48	26										
ST4	Land Adj. Hull Road and Grimston Bar	249											41	41	41	41	41	44						
ST5	York Central	2500							45	107	107	107	107	119	119	119	119	143	143	143	143	143	143	693
ST7	Land East of Metcalfe Lane	845											35	35	70	70	70	70	70	70	70	70	70	145
ST8	Land North of Monks Cross	970											35	70	70	70	105	105	105	105	105	105	95	
ST9	Land North of Haxby	735											35	35	35	70	70	70	70	70	70	70	70	70
ST14	Land to West of Wigginton Road	1453											35	70	105	105	105	105	105	105	105	105	105	403
ST15	Land to West of Elvington Lane	3209												35	70	105	105	105	140	190	190	190	2079	
ST16	Terrys Extension Site - Terrys Clock Tower (Phase 1)	22						10	12															
ST16	Terrys Extension Site - Terrys Car Park (Phase 2)	33						17	16															
ST16	Terrys Extension Site - Land to rear of Terrys Factory (Phase 3)	56						18	17	21														
ST17	Nestle South (Phase 1)	279						35	244															
ST17	Nestle South (Phase 2)	302							50	50	50	50	50	52										
ST31	Land to the South of Tadcaster Road, Copmanthorpe	158											35	35	35	35	18							
ST32	Hungate (Phases 5+) (Blocks D&H)	417								196			221											
ST33	Station Yard Wheldarke												35	35	35	35	7							
ST36	Imphal Barracks, Fulford Road																100	100	100	100	100	100	100	189
Annualised Projected Completion for ST Sites (CYC Trajectory)		12694					0	45	384	238	422	240	862	696	747	765	790	892	848	848	783	783	783	3559
4. Projected Housing Completions from Non Allocated Unimplemented Consents																								
Total		1853					298	459	543	112	223	65	65	65	23	0								
5. Projected Housing Completions From Communal Establishments/ Student Accommodation																								
Total		0					0																	
Supply Trajectory																								
Actual Net Completions			1296	449	560	622																		
Projected Completions (all sites)							367	504	1118	725	872	360	1596	867	791	765	790	892	848	848	783	783	783	
Windfalls							0	0	0	0	0	0	0	120	120	120	120	120	120	120	120	120	120	120
Projected Housing Completions (Inc Windfall Allowance)							367	504	1118	725	872	360	1596	987	911	885	910	1012	968	968	903	903	903	
Cumulative Completions (Including Windfalls)			1296	1745	2305	2927	3294	3798	4916	5641	6513	6873	8469	9456	10367	11252	12162	13174	14142	15110	16013	16916	17819	
Requirement (790 dpa plus 32 under supply) 822 dpa			822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	790	790	790	790	790	790
Cumulative Requirement			822	1644	2466	3288	4110	4932	5754	6576	7398	8220	9042	9864	10686	11508	12330	13152	13942	14732	15522	16312	17102	
Over/Under Supply			474	101	-161	-361	-816	-1134	-838	-935	-885	-1347	-573	-408	-319	-256	-168	22	200	378	491	604	717	
Detailed Trajectory (including 10% Non-Implementation Rate)																								
Projected Completions (all sites)							367	504	1118	725	872	360	1596	867	791	765	790	892	848	848	783	783	783	
Projected Completions (all sites) - 10% Non-Implementation Rate Applied							330.3	453.6	1006.2	652.5	784.8	324	1436.4	780.3	711.9	688.5	711	802.6	763.2	763.2	704.7	704.7	704.7	
Windfall Allowance		600					0	0	0	0	0	0	0	120	120	120	120	120	120	120	120	120	120	
Total Projected Completions (with 10% Non Implementation rate applied and windfalls) + Actual completions 2017-2021			1296	1745	2305	2927	330.3	453.6	1006.2	652.5	784.8	324	1436.4	900.3	831.9	808.5	831	922.8	883.2	883.2	824.7	824.7	824.7	
Cumulative Completions (with 10% Non Implementation rate applied and windfalls)			1296	1745	2305	2927	3257.3	3710.9	4717.1	5369.6	6002	6826.4	7662.8	8562.2	9524.1	10542.6	11628.6	12781.4	13994.6	15277.8	16632.5	18077.2	19611.9	21246.6
Annual Housing Target			790	790	790	790	790	790	790	790	790	790	790	790	790	790	790	790	790	790	790	790	790	790
Inherited Shortfall Annualised over Plan Period			32	32	32	32	32	32	32	32	32	32	32	32	32	32	32	32	32	32	32	32	32	32
Annual Target (Inclusive of Shortfall)			822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	790	790	790	790	790	790
Cumulative Annual Target (Inclusive of Shortfall)			822	1644	2466	3288	4110	4932	5754	6576	7398	8220	9042	9864	10686	11508	12330	13152	13942	14732	15522	16312	17102	
Over/Under Supply of Housing (calc = Cumulative completions - cumulative annual target)			474	101	-161	-361	-852.7	-1221.1	-1036.9	-1206.4	-1604	-1106	-1720.4	-1798.7	-1808.6	-1795.1	-3067	-3167.8	-3261	-3591	-3625.7	-3660.4	-3695.1	
5 Year Housing Land Supply Position																								
20% Buffer			164	164	164	164	164	164	164	164	164	164	164	164	164	164	164	164	164	164	164	164	164	164
Cumulative Target			886	1973	2959	3946	4932	5918	6904	7890	8876	9862	10848	11834	12820	13806	14792	15778	16764	17750	18736	19722	20708	21694
Over/Under Supply of Housing (with non-inp rate applied) Compared to cumulative annual target			-65.7	-1188.1	-1167.9	-1501.4	-1702.6	-1903.8	-2105.0	-2306.2	-2507.4	-2708.6	-2909											

Contact details

Enquiries

Craig Alsbury
0121 609 8445
craig.alsbury@avisonyoung.com

Visit us online

[avisonyoung.com](https://www.avisonyoung.com)

Avison Young

3 Brindleyplace, Birmingham B1 2JB

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