Community Infrastructure Levy Consultation 2023

	QUESTION SUMMARIES	DATA TRENDS	INDIVIDUAL RESPONS
All Pages –			
Respondent #57	- « ³⁵		
COMPLETE			
Started:	Monday, February 27, 2023	3 11:46:39 AM	
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IP Address:			
Page 1: Survey Info	rmation		
Q1			
Do you confirm tha order to take the su	t you have read and understood th irvey.	e privacy notice? You	must select 'Yes' in
Yes			
Page 2: Register for	consultation		
Q2			
Your name:			
Eamonn Keogh			
Contact details:			
Organisation (optiona	O'Neill Associates		

Organisation (optional)	O'Nelli Associates
Address	
Address 2	
City/town	
Post code	
Email address	

Q4

Do you wish to notified of future updates to CIL by the council? If yes we will use contact details provided above

Yes

Q5

Do you wish to participate in the CIL examination? If yes we will use contact details provided above

Yes

Page 3: Your response

Q6

1a. The Community Infrastructure Levy (CIL) Viability Study informed the production of the proposed rates in the draft CIL Charging Schedule. Do you have any comments on the content of the CIL Viability Study?

Yes - See attached representation document

Q8

2a. Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusions of the CIL Viability Study?

See attached representation document summitted in response to Question 1a

Q10

3a. Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

No - See attached representation document summitted in response to Question 1a

Q12

4a. CIL rates should not be set at a level which could render new development financially unviable. To ensure the financial viability of new development in the area, and to take into account variations in land prices and development costs throughout the authority's area, the draft CIL Charging Schedule proposes variable rates for different kinds of development. Do you have any comments on the proposed CIL rates?

Yes - See attached representation document summitted in response to Question 1a

Q14

5a. Should any types of development be charged a different CIL rate, and if so, why? Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed.

Yes - See attached representation document summitted in response to Question 1a

Page 4: Your response

Q16

6a. To support the financial viability of new development in the area, the draft CIL Charging Schedule includes an Instalments Policy which allows specified levels of levy charges to be paid in instalments over a set period of time. Do you have any comments on the draft Instalments Policy?

Yes - See attached representation document summitted in response to Question 1a

Q18

7a. Part 6 of the CIL Regulations (as amended) allows the Council to give discretionary relief for certain types of development from paying the levy. The Council has not identified any types of

development which may require this beyond the compulsory relief and exemptions outlined in the Regulations. Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Yes - See attached representation document summitted in response to Question 1a

Q20

8a. Do you have any other comments on the draft CIL Charging Schedule?

Yes - See attached representation document summitted in response to Question 1a

Q22

9a. Do you have any other comments on the CIL evidence base?

Yes - See attached representation document summitted in response to Question 1a



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Chartered Town Planning Consultants

City of York Community Infrastructure Levy Consultation 27 March 2023

Response on behalf of Galtres Garden Village Development Company

INTRODUCTION

- i. These representations are made on behalf of Galtres Garden Village Development Company (GGVDC) in response to the City of York Community Infrastructure Levy (CIL) Consultation March 2023.
- ii. The Council's decision to introduce a CIL is welcomed because it provides greater certainty in terms of development costs, however the evidence base and charging schedule is fundamentally flawed and unsound.
- iii. There has been no meaningful consultation with the development industry prior to the publication of the consultation documentation, except for a workshop with development industry representatives on 22 September 2016. Paragraph 1.11 of the CIL Viability Study (CVS) states that little further evidence was submitted to inform the assumptions in the CVS. However, the presentation at the workshop stated that there would be a public consultation on the preliminary draft charging schedule before this formal consultation period.
- iv. It is hugely disappointing that the consultation on the preliminary draft charging schedule has not happened, as promised, and a significant weakness of the CIL evidence base that it has not been properly informed by specialists who work in the development industry day to day Planning Practice Guidance (PPG) Viability (paragraph 2, Reference ID: 10-002-20190509 states that *"It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers"*
- v. The CIL is proposed at a time of considerable uncertainty in terms of both the economy, and central government's changes to the developers contributions regime proposed by the Levelling Up and Regeneration Bill. At the time of writing

inflation was expected to be falling but instead has increased to 10.4% (up from 10.1%) and interest rates have risen for 4.0% to 4.25%.

- vi. This wider economic picture of rising costs has fed through to rapidly increasing construction costs. Barbour ABI, the market leading provider of construction project information, reported that "Price rises were at record levels over summer 2022, with many goods seeing 25 per cent annual inflation. This has now dropped closer to 15 per cent, but some products still hover well above 20 per cent and insulation products have recently jumped to 50 per cent.
- vii. Against this uncertain economic background, the government has decided to delay the full introduction of its proposed new Infrastructure Levy by up to 10 years due to uncertain of impact on the delivery of development. These same uncertainties exist with the current CIL system.
- viii. We request to be notified about:
 - submission of the CIL Draft Charging Schedule to the Examiner in accordance with Section 212 of the Planning Act 2008;
 - the publication of the recommendations of the Examiner and the reasons for those recommendations; and
 - the adoption of the charging schedule by the charging authority.
- ix. In accordance with Regulation 21 of the CIL Regulations 2010 we wish to exercise our right to be heard by the examiner either as a consortium or as an independent stakeholder organisation.
- x. The questions (1-9) posed by the Council as part of this consultation and our responses are set out below.

QUESTIONS AND RESPONSES

1) Do you have any comments of the content of the CIL viability study?

Response

i. There is no Infrastructure Funding Statement as part of the consultation. As such it is unclear what will be delivered through CIL and what will be required to be provided by developers through s106 obligations to make a development acceptable in planning terms. Without this detail, it is not possible to fully understand the viability position of schemes.



- ii. The Council's approach to on-site open space provision highlights this issue. Currently, the Council applies Policy GI6 (new open space provision) of the Publication Draft Local Plan states 'all residential development proposals should contribute to the provision of open space for recreation and amenity. This is based The Open Space and Green Infrastructure Update 2017 (referred to in the local policy) which requires 40.5 sq m of amenity space for a 1 bed dwelling and 17.8 sq m towards sports. This is not typically possible to provide for on urban sites proposing even low densities (there is not the space). As such the Council typically requires an off-site contribution.
- iii. Clearly, both on site and/or s106 contributions have a significant impact on viability which has not been considered in the CIL viability study. An example of the application of open space policy/ contributions can be found with reference to planning permission 19/00979/OUTM dated 1 July 2020 which relates to a former gas works that had viability issues even without CIL and therefore would have been undeliverable if the draft CIL charging schedule was applied
- iv. Similarly, the Council's approach to sustainable travel contributions and travel plan obligations which are also applied and are not considered as part of the CIL evidence base.
- v. Although the CVS takes account of S106 obligations the assumption about values and costs are averages. Paragraph 5 of the Consultation Information Booklet published with the CVS is explicit in stating "it is not required, and would be impossible, to look at every type of development individually, hence the use of typologies.
- vi. In practical terms what this means is that where a residential scheme liable for CIL has higher development costs that affect viability, and given that CIL is non-negotiable, it is the section 106 requirements such as affordable housing, that will be negotiated down. Delivery of affordable housing is a key objective of the emerging local plan which will be severely threatened by the introduction of the draft CIL Charging Schedule. Similarly, the Council has fallen short of its local plan targets for housing delivery for many years which is likely to worsen rather than address the existing backlog.
- vii. The potential impact of the CIL on affordable housing delivery is particularly relevant go the GGVDC. The company's proposal for a new Garden Village includes



affordable housing proviso at 40% - higher than the maximum level of 30% set out in Policy H10 of the Draft Plan. The residential CIL rate of £200 would severely impact on the delivery of this level of affordable housing or would impact on the viability of the scheme or both.

- viii. Paragraph 4.44 of the CVS states that brownfield sites are assumed to include the necessary strategic infrastructure from their existing or previous use. However, this assumption understates the requirement on many brownfield sites to provide reinforced or completely new infrastructure. For example, the Council's drainage and flood risk policies require a 30% betterment for surface water drainage/ SuDS, and flood risk mitigation. As the Local Plans spatial strategy directs development to brownfield sites and the urban area this requirement will impact on a considerable number of development schemes
 - ix. Similarly, the majority of the city centre is located within an area of archaeological importance, and historic core conservation area. Both of these designations, and associated local plan policies increase development costs and have significant viability implications which are overlooked by the CVS.
 - x. Viability evidence base is outdated and doesn't take any account of significant shifts in market conditions in Q3/4 2022.
- xi. Viability evidence relies on RICS BCIS build costs. We understand that other respondents have submitted evidence to demonstrate that these costs are too low and backward facing, particularly at a time of persistent high inflation.
- xii. The Planning Practice Guidance (PPG) plan making (paragraph: 039 Reference ID: 61-039-20190315) requires local planning authorities to "prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable". This has not been undertaken for the emerging local plan in relation to its latest iteration given most policies have been subject to change during the course of the local plan examination.
- xiii. Similarly, National Planning Policy Framework paragraph 34, and PPG Paragraph: 002 Reference ID: 10-002-20190509 states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that



the total cumulative cost of all relevant policies will not undermine deliverability of the plan."

- xiv. The latest modifications to the emerging local plan increase policy requirements for most developments, particularly major developments. These policies have a cumulative cost impact when taken together. The Council does not appear to have fully considered how sites can also bear CIL given this demanding policy context. A full viability review and justifiable evidence of the modified policy requirements will be necessary. Policy requirements include (not exhaustive), the majority of which are not considered in the CVS:
 - a) 75% carbon reduction aspirations policy CC2 (modification) (this is considered within CIL Viability study)
 - b) 10% Bio diversity net gain (this is considered within CIL Viability study)
 - c) Accessible Housing Standards (this is considered within CIL Viability study)
 - d) Archaeology much of the city centre is within an archaeology area of importance which, taken on its own, gives rise to considerable risk and significant additional development costs
 - e) H10(i) states "higher rates of (affordable housing) provision will be sought where development viability is not compromised". This implies that development may be subject to additional affordable housing if it can be viably provided, and that a viability assessment will be required for all applications over 5 units which will delay the determination period significantly, particularly given to limited capacity of the district valuer. Policy H10 requires all viability assessments to be reviewed by the district valuer.
 - f) Changes to policy H7 and the requirement for nominations agreements.
 - g) Air Quality assessments/mitigation for all major applications
 - h) Flood mitigation measures. Policy requires a 30% betterment for surface water runoff which typically requires attenuation or SuDS, and much of the city centre is within high flood risk area. Again, taken on its own, flood mitigation gives rise to considerable risk and significant additional development costs.



- i) Heritage policy. The vast majority of the city centre is within the York Historic Core Conservation Area and contains amongst the highest concentration of listed buildings and scheduled ancient monuments in England. These heritage constraints arising from national and local heritage policies, taken on their own, flood mitigation gives rise to considerable risk and significant additional development costs.
- j) Travel Plan obligations e.g. car clubs, free bus travel, cycle equipment contributions, travel plan coordinator.
- k) Green infrastructure/ on-site open space provision the local plan including its evidence base prescribes totally undeliverable targets with regards for open space as part of new development and currently s106 payments are sought for any shortfall. Will this now be provided through CIL and does this mean no on site provision is required? If not, on site provision has significant viability impacts.

2) Do the proposed levy rates set out in the draft CIL Charging Schedule appropriately reflect the conclusion of the CIL Viability Study?

Response

No, the conclusions of the CVS is fundamentally flawed, contains a number of errors and does not justify the draft CIL charging schedule, for the reasons set out below:

- i. the proposed rate or rates would seriously undermine the deliverability of the emerging local plan, particularly with regards to residential delivery; delivery of affordable housing; new open space delivery; and brownfield first principles, amongst others.
- It is essential that the CIL rates are set at a level which ensures that most developments remain robustly viable over time as development costs change most likely upwards. As such CIL rates should not be set at a marginal viable point. It is vital for the Council to build in a significant degree of flexibility to ensure durability of the CIL charging schedule. The submitted evidence has been overtaken by rapidly changing economic circumstances and an evolving planning policy context and fails to take account of the following, amongst other aspects:
 - a. National consultations on changes to NPPF and CIL
 - b. Changes in the housing market and house prices



- c. Changes in inflation, interest rates and the cost of borrowing
- d. Changes in build costs
- iii. The residential rates are too high, unjustified and are amongst the highest, if not the highest across the entirety of Yorkshire and Humber, even when allowing for indexation since adoption in other charging authorities. The Council has not provide comprehensive, robust and up-to-date justification for these charges as required by regulation 14(1) of the CIL Regulations (as amended).
- iv. The CVS has not properly understood development costs, particularly for brownfield sites. The notion that allocated sites within the local plan incur greater development costs than other residential sites in unjustified. Significantly, the CVS has not adopted a comprehensive and robust 'policy on' approach with the full cost of the emerging local plan policies (including affordable housing) being accounted for, and taking precedence over, the introduction of CIL rate setting.
- v. Planning applications will no longer be submitted for retail uses, instead they will refer to Class E of the use class order. How will the Council apply the charging schedule to planning permissions that simply apply for class E and do not distinguish between retail or office for example?
- vi. It is counter-intuitive that development costs of brownfield sites are lower than greenfield sites for Extra Care accommodation. The proposed CIL rates are contrary to Government and local plan objectives of brownfield first.
- 3) Do the proposed levy rates set out in the draft CIL Charging Schedule provide an appropriate balance between securing infrastructure investment and supporting the financial viability of new development in the area?

Response

No, the proposed CIL rates do not support delivery of the emerging local plan and would have a disastrous effect on local development projects for the reasons set out below:

i. The 'appropriate balance' is the level of CIL which maximises the delivery of development and supporting infrastructure in the area. This has not been justified and there is a lack of clarity in how the CIL will be allocated and spent.



- ii. The CIL Infrastructure Funding Gap Assessment (IFGA) and Consultation Information Booklet (CIB) documents issued with the Draft Charging Schedule set out to identify the cost of infrastructure required to support new development and where it is to be spent. However, there is a lack of clarity between the documents. For example, the IFGA identifies a cost of £47.3 million required for "Education". However, section 10 of the CIB, states that Infrastructure for the purposes of CIL spend "can" include transport, flood defences, schools, hospitals and other health and social care facilities.
- iii. This provides no certainty or clarity, for example, for residential developers as to whether they will be paying CIL and a Section 106 contribution for education; flood alleviation; or health facilities.
- iv. The Charging Schedule therefore needs to state clearly what the CIL will be spent on so that developers can make a proper assessment of whether the CIL and S106 costs on a scheme be viable or whether necessary development will be inhibited.

4) Do you have any comments on the proposed CIL rates?

Response

- i. We would question the appropriateness of the proposed CIL rates given the current uncertain economic environment facing the property and construction sectors. Viability is becoming more challenging as high levels of inflation in build costs are proving persistent and sales values remain static or at best are increasing at below the rate of build cost inflation.
- ii. With regards to the Residential CIL rate, this must be considered in the context of the acknowledged poor delivery of housing in the City over a long run period. Evidence we have presented to the Local Plan Examination, using the Councils own data, demonstrates that in the 10 years 2013/13 to 2021/22, house completion rates fell below the OAH of 790 in 7 of those years. However, the Council's housing completion data includes student accommodation. If student accommodation is excluded, housing completions fell below the OAHN for 9 of the 10 years.
- iii. Furthermore, the Council's Housing trajectory set out in supporting evidence to the Local Plan Examination, shows that a cumulative undersupply of housing will persist until 2023/24 – i.e. 7 years into the Plan period. Our analysis indicates it will persist until 2024/25, 8 years into the Plan period (See Appendix A).



iv. In this context of long-term undersupply of housing, the imperative is clearly to implement the NPPF requirement to significantly boost the supply of housing. Against this background, the proposed £200 psm rate for housing, the highest rate in the Yorkshire region, seems clearly anomalous and could seriously impede the delivery of housing so desperately required to make good more than a decade of undersupply.

5) Where alternative rates are proposed, please provide evidence to demonstrate why a proposed rate should be changed

Response

i. The CIL viability report should be updated to account for changed economic circumstances and current build costs and values.

6) Do you have any comments on the draft Instalments Policy?

Response

Yes, as set out below:

ii. The is no certainty with regards to larger schemes over £500,000. For example, what happens if the developer and Council are unable to agree a project specific payment schedule?

7) Is there a need to provide discretionary relief from the levy to any types of development, and if so, why?

Response

i. Development schemes that provide for a higher level so affordable housing than required by policy should be eligible for discretionary relief.

8) Do you have any other comments on the draft CIL Charging Schedule?

Response

We reserve the right to update our evidence at the Examination taking account to circumstances prevailing at the time.



9) Do you have any other comments on the CIL evidence base?

Response

We reserve the right to update our evidence at the Examination taking account to circumstances prevailing at the time.



APPENDIX A

Table 1 Revision to the "Table 1 CYC Housing Trajectory, August 2022" in HousingTrajectory Note August 2022 CYC/EX/107/1



1. Net Hou	Trajectory Note August 2022 CYC_EX_107_1 TOT sing Completions 2017 to 2020	TAL 1	L7/18 1 Actual	Completi		0/21 2	1/22 22	2/23	23/24 2	4/25 2	5/26 2	6/27 27	7/28 2	8/29 2	9/30 30	0/31 3	1/32 3	2/33	Period	33/34 3	4/35 3	15/36 3	6/37 3	7/38	plan
	Net Housing Completion		1296	449	560	622	402												3329						0
	Net Communal Establishment and Student Accommodation Completions (Ratios applied)		35	2	67	82	252												438						0
Total			1331	451	627	704	654												3767						
2. Housing H1a & b	Allocations Below 5 ha (H Sites) Former Gas Works, 24 Heworth Green (National Grid Properties)	607									215		392						607						0
H3	Burnholme School	83							63	15	5		332						83						0
H5	Lowfield School	165						69	24										93						0
H7 H8	Bootham Crescent Askham Bar Park & Ride	93 60						25	35	33	35	25							93 60						0
H10	The Barbican	187									55	25	187						187						0
H20	Former Oakhaven EPH									36									36						0
H29 H31	Land at Moor Lane Copmanthorpe Eastfield Lane Dunnington	92 82						6	2 40	40 37	50								92 83						0
H38	Land RO Rufforth Primary School Rufforth	21						Ŭ	10	11									21						0
H39	North of Church Lane Elvington	32									17	15							32						0
H46 H52	Land to North of Willow Bank and East of Haxby Road, New Earswick Willow House EPH, 34 Long Close Lane	117 15							20	35	40 15	22							117 15						0
H53	Land at Knapton Village	4									4								4						0
H55	Land at Layerthorpe	20										20							20						0
H56 H58	Land at Hull Road	0 15					0			15									0 15						0
	Clifton Without Primary school d Projected Completions H Sites (Hide)	15				0	0	100	194	222	381	82	579	0	0	0	0	0	1558	0	0	0	0	0	0
	allocations above 5ha (ST Sites)																								
ST1a	British Sugar/Manor School	1100										150	150	150	150	150	150	150	1050	50					50
ST1b	Manor School	100											35	35	30				100						0
ST2 ST4	Former Civil Service Sports Ground Millfield Lane Land Adj. Hull Road and Grimston Bar	263 211				0		53	78	52	50 35	30 40	40	40	40	16			263 211						0
ST5	York Central	2500									45	107	107	107	107	119	119	119	830	119	143	143	143	143	691
ST7	Land East of Metcalfe Lane	845										50	90	120	120	120	120	120	740	105					105
ST8	Land North of Monks Cross	970								30	70	100	100	100	100	100	100	100	800	100	70				170
ST9 ST14	Land North of Haxby Land to West of Wigginton Road	735 1348										45 60	90 60	90 160	90 160	90 160	90 160	90 160	585 920	90 160	60 160	108			150 428
ST15	Land to West of Elvington Lane	3339											35	70	105	105	105	140	560	210	210	280	280	280	1260
ST16	Terrys Extension Site - Terrys Clock Tower (Phase 1)	22						21											21						0
ST16 ST16	Terrys Extension Site - Terrys Car park (Phase 2) Terrys Extension Site - Land to rear of Terrys Factory (Phase 3)	0																	0						0
ST10 ST17	Nestle South (Phase 1)	279							279										279						0
ST17	Nestle South (Phase 2)	425								35	35	35	35	35	35	35	35	22	302						0
ST31 ST32	Land to the South of Tadcaster Road, Copmanthorpe Hungate (Phases 5+) (Blocks D & H)	158 375								35	35 196	35	35	18	179				158 375						0
ST32	Station Yard Wheldarke	150								7	35	35	35	38	1/5				150						0
ST36	Imphal Barracks, Fulford Road	769																100	100	100	100	100	100	100	500
	d projected Completions for ST Sites					0	0	74	357	159	501	687	812	963	1116	895	879	1001	7444	934	743	631	523	523	3354
4. Projecte Total	d Housing Completions From Non Allocated Unimplemented Consents	1713						483	333	363	250	105	143	36		0	0	0	1713	0	0	0	0	0	
	d completions from communal establishments and student accommodation										-	_	_		_		-				_		-		0
Total		436						357	26	53	0	0	0	0	0	0	0	0	436	0	0	0	0	0	0 0
Supply Traj			1221	451	(27	704	654												7767						0
	Completions (2017 to 2022) Completions (all sites)		1331	451	627	704 0	654 0	1014	910	797	1132	874	1534	999	1116	895	879	1001	3767 11151	934	743	631	523	523	0 3354
Windfalls						0	0	0	0	0	199	199	199	199	199	199	199	199	1592	199	199	199	199	199	995
	Projected Housing Completions (Inc Windfall Allowance)			4700				1014	910	797	1331	1073	1733	1198	1315	1094	1078	1200	12743		942	830	722	722	4349
	e Completions (Including Windfalls) ent (790pa plus 32 under supply) 822dpa		1331 822	1782 822	2409 822	3113 822	3767 822	4781 822	5691 822	6488 822	7819 822	8892 822	10625 822	11823 822	13138 822	14232 822	15310 822	16510 822	13152	17643 822	18585 822	19415 822	20137 822	20859 822	4110
	e Requirement		822	1644	2466	3288	4110	4932	5754	6576	7398	8220	9042					13152	10101		14796	15618		17262	0
Over/Unde	er Suppy		509	138	-57	-175	-343	-151	-63	-88	421	672	1583	1959	2452	2724	2980	3358		3669	3789	3797	3697	3597	0
Detailed Tr	rajectory (including 10% Non-Implementation Rate)																								0 0
	Completions (all sites)		0	0	0	0	0	1014	910	797	1132	874	1534	999	1116	895	879	1001	11151	934	743	631	523	523	3354
Projected C	Completions (all sites) - 10% Non-implementation Rate Applied		0	0	0	0	0	913	819	717	1019	787	1381	899	1004	806	791	901	10035.9	841	669	568	471	471	3018.6
Windfall All Total Proie	lowance cted Completions (with 10% Non implementation rate applied and windfalls) + Actual										199	199	199	199	199	199	199	199	1592	199	199	199	199	199	995
-	is 2017-2022		1331	451	627	704	654	913	819	717	1218	986	1580	1098	1203	1005	990	1100	15395	1040	868	767	670	670	4013.6
	e Completions (with 10% non implementation rate applied and windfalls)		1331	1782	2409	3113	3767	4680	5499	6216	7434	8419						15395	10150		17302	18069		19409	
	get (Inclusive of Shortfall) e Annual Requirement (Inclusive of Shortfall)		822 822	822 1644	822 2466	822 3288	822 4110	822 4932	822 5754	822 6576	822 7398	822 8220	822 9042	822 9864	822 10686	822 11508	822 12330	822 13152	13152	822 13974	822 14796	822 15618	822 16440	822 17262	4110
	er Supply of Housing (calc = Cumulative completions - cumulative annual target)		509	138	-57	-175	-343	-252	-255	-360	36	199	957	1233	1614	1797	1965	2243		2461	2506	2451	2299	2147	
5 year hou																									
	uirement (822*5)						4110	4110	4110	4110 0	4110														
	be carried over remainag plan period (Absolute value of H) ithin 5 years (5x(G=Remaining Plan Period) (Liverpool)						343 156	227 114	165 92	0	0	0	0	0	0	0	0	0							
20% buffer	(0.2*(J+L))						853	845	840	822	822	822	822												
5% buffer (j	· ·						E110	FOCO	5042	4022	4022	4022	4022	206	206	206	206	206							
-	al 5 year requirement (J+L+Buffer) ear land supply (Row D)						5119 4652	5068 5319	5042 5598	4932 6085	4932 5871	4932 5876	4932 5396	4316 5338	4316 5002	4316 4764	4316 4444	4316 4014							
	er Supply (with NI applied) against total 5 year requirement (P-0)						-467	251	556	1153	939	944	464	1022	686	449	128	-302							
Land supply	y in Years (no account for previous oversupply)						4.54	5.25	5.55	6.17	5.95	5.96	5.47	6.18	5.80	5.52	5.15	4.65							
Rolling 5 ye	ear requuirement (J=(M orN)-H)									5292	4896	4733	3975	3083	2701	2519	2351	2073							
	ly in years inclusive of past oversupply									5.75	6.00	6.21	6.79	8.66	9.26	9.46	9.45	9.68							

