# Ashfield District Council Logo

# Ashfield District Local Plan Examination

# Matters, Issues and Questions identified by the Inspectors

# Matter 9:

# The Supply and Delivery of Housing Land

**December 2024**

**Ashfield District Council’s response to Inspectors’ Document INS03**

This document is Ashfield District Council’s response to the Matter, Issues and Questions (MIQs) identified for examination by Inspectors Mr. Philip Mileham and Mr Graham Wyatt, of the Planning Inspectorate, as published on the 30th September 2024. This is one of twelve separate papers produced to address the specific matters and issues identified on the front page.

Each response paper includes a number of references to specific evidence which has been relied upon in answering the MIQs. These reference numbers (shown as **[XXXX]**) relate directly to the Examination Library website, where all evidence is published: <https://www.ashfield.gov.uk/local-plan-examination/examination-library/>

The Inspectors’ questions are shown below in ***bold italics***.

The Council’s responses are shown in normal typeface below the Inspector’s questions.

|  |
| --- |
| Proposed Modifications arising from the Inspectors’ MIQs are set out in grey tint boxes. |

## Issue: Whether there would be a deliverable housing land supply in years 1-5 and developable supply in years 6-15.

### Overall Supply

***9.1 What is the estimated total supply of new housing over the period 2023/24-2039/40? How has this been determined? Is the housing trajectory justified?***

Council’s response

9.1.1 The estimated total supply of housing for the Plan period of 2023-2040 is set out in the Council’s Housing Land Position Statement, October 2024 [ADC.04] Table B. This identifies a total of 7345 dwellings, made up of 451 completions for year 2023/24, and future supply from the following sources:

* Planning permissions (commitments), including C2 and C3
* Known permitted development/prior approvals
* Sites allocated under Policy H1
* Small site windfall allowance beyond 3 years

9.1.2 A non-implementation rate is applied based on historic rates (as set out in Background Paper 2: Housing [BP.02], and any known demolitions or losses with planning approval are also taken into account.

9.1.3 The housing trajectory in ADC.04 is based on the most recent information available for each individual site and breaks down supply from each individual source. Sites which do not fall within the NPPF definition are excluded from the first 5 years (starting at the current year). Lead in times and annual delivery are based on a series of assumptions where more site-specific details are not known (as set out in Background Paper 2: Housing [BP.02]). The Council have engaged with developers in respect of delivery and have also take account of recent on site and/or Development Management activity.

9.1.4 The Council anticipates that additional delivery is likely on large windfall sites within the Plan period, although this is not relied upon in the housing land supply calculations. There is also potential for further development of new homes via the Council’s own building programme, and also under Policy H4 Rural Exceptions. More detail regarding these aspects is set out in answer to Question 9.4

***9.2 What is the estimated supply from site allocations? What is the evidence to support their deliverability? Are the estimates of dwelling completions and their timing justified?***

Council’s response

* + 1. The estimated supply from site allocations (as updated in ADC.04) is 5,454 dwellings. This is made up of:
* 1,931 dwellings on permitted sites,
* 226 dwellings which benefit from a resolution to grant planning permission subject to the signing of a s106 agreement, and
* 3,256 dwellings on non-permitted sites (NB this includes one site for 40 dwellings which has now secured full planning permission since October 2024)
	+ 1. In addition to the allocated large sites, a further 353 dwellings have permission on small sites which fall below the threshold for allocation.
		2. Many of the permitted sites are under construction and it has been assumed that these sites will continue to deliver at approximately the same rate, unless information suggests otherwise. As already mentioned in answer to Qu. 9.1, the Council does engage with developers of specific sites where possible to gain an understanding of progress and delivery.
		3. The Council is confident that potential annual delivery rates for each individual site are realistic and are based on known activity or standard assumptions which are locally derived (as set out in BP.02). Chart A in paper ADC.04 illustrates potential delivery from varying sources and draws from Table C. The data used for year 2023/24 reflect actual delivery for that year. Whilst the chart identifies some fairly significant peaks at year 2026/27 and again at year 2030/31, in real terms this is unlikely to be the case. It is clearly difficult to predict with certainty when development might come forward and the Council relies on a number of aspects to make an informed decision. This includes (but is not limited to):
* current planning status;
* commencement on site;
* firm progress being made towards the submission of an application, e.g. correspondence with developers to set out their delivery intentions including anticipated start and build out rates;
* firm progress with site assessment work;
* information derived from the Strategic Housing and Economic Land Availability Assessment (SHELAA), e.g., in respect of site constraints.
	+ 1. Where sites have not been commenced, and in the absence of site specific information from developers/agents, the Council takes an approach to delivery based on the NPPF definition of ‘deliverable’ alongside a standard set of locally derived delivery assumptions (included in BP02: Housing). This will naturally result in ‘peaks’ where commencement is possible and equally likely for many sites. For instance, sites may not meet the definition of ‘deliverable’ and cannot therefore be included within the first 5 years, however there may not be any reason why they cannot or will not progress and, hence, can be included in the trajectory from year 6 onwards.
		2. Clearly the housing market has a role, and it is not in developer interests to flood the market. However, in these circumstances, as it is not always possible to ascertain the order in which sites will start to deliver. As such, it is important to focus on the quantum of development planned for, making the assumption that peaks and troughs identified in the trajectory chart will naturally smooth as the market delivers.
	1. ***What evidence is there to support the timing of projected completions from each of the large sites (50 dwellings and above) without planning permission that are relied upon within the housing trajectory?***

Council’s response

* + 1. All sites put forward as potential allocations have been assessed as developable, and no viability issues have been raised via the Whole Plan Viability assessment (to be discussed at Matter 12). As discussed in response to Questions 9.1 and 9.2, the housing trajectory in ADC.04 is based on the most recent information available for each individual site. Potential annual delivery rates for each individual site are realistic and are based on known activity and/or standard assumptions which are locally derived. The table below sets out the current status and assumed delivery timescale for each site of 5 dwellings and above.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Site Ref. | Site Name | Greenfield/ Brownfield | Planning Permission | Potential Yield (Dwellings) | Current Status & Delivery Timescales |
| H1Hc | Land north of A611 / South of Broomhill Farm, Hucknall | G | No | 499 | 2024 pre-application enquiry from developer has been received in respect of the area encompassed by the existing allotments. Requires connections between adjacent ongoing development and wider allocation. Anticipated commencement year 2029/30. |
| H1Hd | Land adjoining Stubbing Wood Farm, Watnall Road, Hucknall | G | No | 198 | Developer interest presently unclear.Anticipated commencement year 2033/34. |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Site Ref. | Site Name | Greenfield/ Brownfield | Planning Permission | Potential Yield (Dwellings) | Current Status & Delivery Timescales |
| H1Kc | Land at Doles Lane, Kirkby-In Ashfield | B | No | 54 | 2024 pre-application enquiry from developer has been received which encompasses this site and land to south. Anticipated commencement year 2029/30. |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Site Ref. | Site Name | Greenfield/ Brownfield | Planning Permission\* | Potential Yield (Dwellings) | Current Status |
| H1Sb | South of Vision West Nottinghamshire College, Cauldwell Road, Sutton-In-Ashfield | G | No | 208 | Resolved in March 2023 to grant outline permission subject to S106 22/03/2023 (V/2021/0792) for up to 235 dwgs. Arc Partnership on behalf of NottinghamshireCounty Council.Anticipated commencement year 2028/29. |
| H1Sd | Adj Oakham Business Park, off Hamilton Road  | G | No | 225 | Application for outline permission for up to 250 currently being assessed (V/2023/0275).Anticipated commencement year 2029/30. |
| H1Sg | Former Miner's Welfare Sports Ground, Stanton Hill | G | No | 112 | Ongoing Full application for 112 dwellings (V/2023/0540). Yield increased accordinglyDeveloper currently active on adjoining site.Anticipated commencement year 2027/28. |
| H1Si | Rear Kingsmill Hospital | G | No | 264 | Developer interest presently unclear.Anticipated commencement year 2032/33. |
| H1Sj | Clegg Hill Drive, Huthwaite | G | No | 104 | O/L pp on western part of site for 37 dwgs now lapsed - V/2015/0391. Owned by Ashfield DC – Estates team currently exploring development options.Anticipated commencement year 2031/32. |
| H1Sk | Sunnyside Farm, Blackwell Road, Huthwaite | G | No | 283 | 2024 pre-application enquiry from developer for approximately 350 dwellings Oct 2023. Illustrative layout would conform with density policy – potential for higher yield than relied upon.Anticipated commencement year 2031/32. |
| H1Sl | North of Fackley Road, Teversal | G | No | 124 | Currently awaiting the outcome of appeal for V/2022/0295. Refused scheme over concerns on landscape character impact, and surface water flooding. Principle of development accepted.Anticipated commencement year 2028/29. |
| H1Ss | Land East of A6075 Beck Lane, Skegby  | G | No | 212 | Ongoing outline application for up to 230 dwellings. Anticipated commencement year 2031/32. |
| H1Su | Rear 113 to 139 Beck Lane, Skegby | G | No | 100 | Planning permission for 9 dwellings granted Feb 2024 on a small part of site.Anticipated commencement year 2032/33. |
| H1Sag | Quantum Clothing Site, North Street, Huthwaite | B | No | 71 | Previous permission lapsed. Ongoing application for 61 dwellings (V/2022/0109) Anticipated commencement year 2026/27. |

* 1. ***Is there compelling evidence that demonstrates windfall development will provide a reliable source of supply as anticipated?***

Council’s response

**Small site windfalls**

9.4.1 The council currently only relies on small site windfalls in the overall future housing supply calculations. The approach to the windfall allowance is updated in the Housing Land Position Statement, October 2024 [ADC.04] and is based on the average annual delivery over the latest 10 year period (2014-2024).

9.4.2 It is important to acknowledge that this period includes 3 years where supply from permitted development sources was not recorded, and also a period of slow delivery as a consequence of the Covid pandemic. The latter has been acknowledged by Government in its approach to the Housing Delivery Test which applies a reduction of 9.5% for year 2019/20 (11 out of 12 months) and 33% in year 2020/21 (8 out of 12 months), to account for the considerable variations in levels of housing delivery as local planning authorities and construction industry faced disruption on a national, regional, and local level.

9.4.3 Despite the above circumstances, the average delivery from small site windfalls over the past decade amounts to 91 dwellings per annum and represents an increase from earlier assessments. The 10 year period has been used to help smooth out the peaks and troughs associated with housing delivery.

9.4.4 The previous assessment for small windfall sites included a slight reduction to account for the impact of national policy resisting development in residential gardens, which included re-categorising them from Brownfield (PDL) to Greenfield in 2010. This was a cautious approach intended to reflect that some early/pipeline projects may not have been approved under the new national policy direction, and hence may result in a reduction of future supply from this source. However, given the timeframe of 2014-2024, and the typical lifespan for planning approvals, this is no longer considered to be necessary. Indeed, the current trend is an upwards one, likely driven by the relaxation of permitted development rights over recent years.

9.4.5 At 1st April 2024 the council could demonstrate a future supply from small site planning permissions of 353 dwellings (Updated data in Table B) - These are included in the 5 year housing land supply. After applying a non-implementation rate this falls to 258. Based on the average annual delivery of 90 dwellings per annum, this amounts to 2.87 years supply of small sites currently in the pipeline.

9.4.6 Given the up to date evidence of delivery, the Council considers it appropriate to revise the approach to small site windfalls as a source of future delivery. This increases the annual figure by 31 dwellings per annum (to 91 dpa), and also includes an allowance for years 4 and 5. It is considered that this modest increase is fully justified, reflecting an average of actual delivery over the past decade and taking account of the current trend. It maintains a cautious approach through the avoidance of double counting in the first 3 years, whilst acknowledging a steady supply moving forwards.

**Large site windfalls**

9.4.7 In respect of large site windfall sites the quantum of potential development is difficult to estimate. A significant amount of recent delivery on large sites in Ashfield has come from ‘windfalls’, i.e., not allocated in the Ashfield Local Plan Review 2002 (ALPR). This is unsurprising as the ALPR only planned to meet development needs to 2011 and these large windfall sites clearly filled a policy void.

9.4.8 The council considers that it would be flawed to project these historical completions forward as that policy void will no longer exist with the adoption of the new Local Plan. To all intents and purposes, the submitted Local Plan identifies all developable sites which were available at the time of writing and were capable of delivering the spatial strategy. However, this does not prohibit additional large sites coming forward within the Plan period, although potential supply from the source is difficult to predict with any level of certainty.

9.4.9 Moving forwards, large site windfalls will be classified as any permissioned site which does not constitute a housing land allocation in the new adopted Local Plan.

9.4.10 In view of the above, there are already some smaller ‘major’ sites coming through the planning application process which are not included within the submitted Local Plan as they were not deemed ‘available’ at that stage. Although they are yet to be permissioned, it is evident that subject to details, the principal of development in some of these locations would be consistent with the site selection process for the local plan – in particular those on brownfield land within the Main Urban Areas, for instance:

* Southwell Lane, Kirkby – Identified brownfield site which had previous permission for 50 homes is now in different ownership and pre-application advice has been sought.
* Former site of Kirkland’s nursing home, Fairhaven, Kirkby – Identified brownfield site with an approximate capacity for 20 homes. Ashfield DC has option to purchase subject to planning approval and pre-application advice has been sought (approved at Cabinet 16th Sept 2024).

9.4.11 The Council has an evolving programme to delivery new affordable homes. In some instances, this will involve land acquisition, and as such sites cannot be considered currently ‘available’ for allocation at this stage. However, it is envisaged that some additional medium sized sites will be delivered under this programme within the Plan period.

9.4.12 It is therefore reasonable to anticipate that there will be some future delivery from such sites, despite the fact that this source is not relied upon in the Council’s land supply calculations.

**Other potential supply**

9.4.13 In addition to the small sites windfall allowance discussed above, plus a realistic potential from large site windfalls, the Local Plan also introduces a new Rural Exceptions Policy (H4). This will facilitate the delivery of additional small scale developments to meet affordable housing needs in perpetuity where sites would not normally be used for housing. Any new homes delivered under this new policy will therefore be supplementary to the historic small site windfall rate currently proposed.

***9.5 Is the inclusion of housing falling within Class C2 of the Use Classes Order as part of the housing requirement justified?***

Council’s response

9.5.1   Yes the inclusion of C2 bedspaces within the housing requirement is justified. This is confirmed by the Housing Delivery Test (HDT) Measurement Rule Book (July 2018) as set out by the Government which allows for communal accommodation to counted towards housing supply.

9.5.2 The HDT Rule Book explains that the net homes delivered is calculated with adjustments including net other communal accommodation (calculated by applying a nationally set ratio (1 dwelling for every 1.8 C2 bedspaces delivered). It is therefore reasonable that they should also be factored in the requirement and forward supply in Ashfield at the same ratio applied in the HDT.

9.5.3   Furthermore, National Planning Practice Guidance states that local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply (Paragraph: 035 Reference ID: 68-035-20190722).

9.5.4  Finally, although not included within the household projections which inform the standard method, C2 dwellings will be occupied in part through people moving from C3 dwellings (which are included) and in many cases this will result in the release of an existing C3 dwelling for other households to reuse.  Therefore, it is reasonable to include the delivery of C2 as part of the housing requirement as it will clearly influence the supply of C3 dwellings.

***9.6 Paragraph 69 of the Framework states that in order to promote the development of a good mix of sites, local planning authorities should (amongst other things) identify land to accommodate at least 10% of their housing requirement on sites no larger than 1 hectare, unless there are strong reasons why this cannot be achieved. What proportion of the housing requirement will be met from sites no larger than 1 hectare?***

Council’s response

9.6.1 Background Paper 1: Spatial Strategy and Site Selection [BP.01] paragraph 10.4 identifies that local planning authorities are required to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. For Ashfield, this means at least 758 dwellings need to be delivered on such sites over the entire 17-year requirement. The supply as proposed in BP.01 Table 22 would more than meet this requirement with a potential for 1,243 dwellings on sites of less than 1 hectare (comprised of a net total of 982 on ‘small’ sites plus 261 from larger allocated sites), representing over 16% of total supply.

### Five year housing supply

***9.7 What is the requirement for the first five years following the anticipated adoption of the plan and what buffer should be applied?***

Council’s response

9.7.1 The Five Year Housing Land Supply (5YHLS) at April 2025 (post adoption) is set out at Appendix 2 of the submitted Local Plan. This identified a 5 year baseline requirement of 2230 dwellings, plus a 20% buffer applied as a consequence of failing the Housing Delivery Test (an assumption is made that this will remain applicable at April 2025, given the latest HDT result of 74% in December 2023). This is consistent with NPPF para. 79 b) which states “where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites”.

 9.7.2 The Council’s Housing Land Supply Position Statement, October 2024 [ADC.04] updates the housing delivery trajectories and 5YHLS (Table E) to reflect actual delivery for years 2023/2024, and also update outstanding commitments. The updated 5YHLS table also includes an assumption for under delivery in year 2024/2025 based on the updated housing trajectory.

9.7.3 It should be noted that a minor error has since been picked up in one of the calculations in this table – in essence, the negative component of 37 dwellings shortfall had inadvertently been added, rather than subtracted from the total 5 year housing land requirement. This clearly give a different result, but still demonstrates a 5YHLS post adoption. This table is replicated below with amendments and continues to demonstrate a 5YHLS at anticipated point of adoption.

|  |  |
| --- | --- |
| **Five Year Housing Requirement** | **Dwellings** |
| Local Housing Need\* @ 446 dpa x 5 years | 2230 |
| Add 20% buffer | 446 |
| Under delivery year 2023 to 2025 (actual plus assumed) | 37 |
| **Total 5 year requirement including buffer** | **~~2639~~ 2713** |
| **Annual requirement including buffer** | **~~528~~ 543** |
| **Supply at April 2025** | **Dwellings** |
| Supply from large sites without planning permission | 845 |
| Planning permissions deliverable within 5 years (2025-2030) | 1806 |
| Discount applied to permissions based on historic lapse rate | -105 |
| Permitted Development deliverable within 5 years | 1 |
| Residential Institutions (C2) deliverable within 5 years# | 48 |
| Small site windfall allowance (2027 to 2030) | 273 |
| **Total amount of housing available and deliverable for the 5 year period post adoption** | **2868** |
| **Calculation of 5 year housing land supply** | **Dwellings/ Years** |
| Deliverable sites for the 5 year period | 2868 |
| Divided by annual requirement for next 5 years | ~~528~~ 543 |
| Equates in years to | **~~5.43~~ 5.29** |
| Oversupply (+) or undersupply (-) of deliverable dwellings | **~~+229~~ 155** |

***9.8 What is the estimated total supply of specific deliverable sites for this period?***

Council’s response

9.8.1 The total estimated supply from specific deliverable sites is 2700 dwellings, within the first 5 years of the Plan post adoption. This is set out in the table in answer to Question 9.7 above, which also includes an estimated discounted rate for potential non-delivery, and an allowance for small site windfalls beyond 2027.

***9.9 What is the estimated supply from each source for this?***

Council’s response

9.9.1 The estimated supply is set out in the trajectories in Section 4 of the Housing Land Supply Position Statement, October 2024 [ADC.04]. The ‘Annual housing delivery from all sources’ table on page 15 of this document identifies delivery anticipated from years 1-5 (2023 to 2028), and also from years 3-8 (2025 to 2030). The latter has informed the 5YLS post adoption as follows:

|  |  |
| --- | --- |
|  **Supply at April 2025** | **Dwellings** |
| Supply from large sites without planning permission | 845 |
| Planning permissions deliverable within 5 years (2025-2030) | 1806 |
| Permitted Development deliverable within 5 years | 1 |
| Residential Institutions (C2) deliverable within 5 years# | 48 |
| **Total amount of housing available and deliverable for the 5 year period post adoption** | **2700** |

# dwelling equivalent based on planning practice guidance ratio of 1.8

***9.10 What is the evidence to support this and are the estimates justified?***

Council’s response

9.10.1 The Council are confident that the anticipated delivery of sites is based on the fullest and most recent accurate information. Housing trajectories are based on reviewing all delivery at individual site level.

9.10.2 The figure includes delivery from all sites meeting definition of ‘deliverable’ as defined in the NPPF glossary. It should be noted that the starting point for the sites meeting this definition is taken to be the current accounting period, not 2025. This acknowledges that 2030, whist falling within the first 5 years of the Plan post adoption, is beyond 5 years from the current point in time.

9.10.3 A windfall allowance is made for small sites only at years 4 and 5. The has been addressed in response to question 9.4.

9.10.4 Individual site allocations will be discussed at Matter 10 (Note: ADC 04 provides the most up to date published trajectory).

***9.11 Taking into account completions since the base date of the Plan, what will be the***

***anticipated five-year housing land requirement on adoption of the plan?***

Council’s response

9.11.1 The anticipated five-year housing land requirement on adoption of the plan is currently estimated to be 5.29 years. This is set out in the table in answer to Question 9.7 above.

***9.12 How does the five-year requirement compare to previous rates of delivery in Ashfield?***

Council’s response

9.12.1 The calculated five-year requirement at 543 dwellings per annum (including a 20% buffer and estimated under delivery) is higher than the average housing delivery in Ashfield over the past decade which equates to 404 dwellings (see below).

***Historic Annual Housing Completions 1st April 2014 - 31st March 2024***

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Year completed (1st April - 31st March) | Total Dwellings delivered on New Build Sites | Net Additions through Conversion/ Change of Use | Net additions through permitted development | Demolitions | C2 Care Home additions (dwelling equivalent) | Total Net Completions |
| 2014 - 2015 | 448 | 19 | n/a | 42 | 25 | 450 |
| 2015 - 2016 | 540 | 23 | n/a | 5 | 2 | 560 |
| 2016 - 2017 | 510 | 34 | n/a | 0 | 38 | 582 |
| 2017 - 2018 | 348 | 48 | 4 | 3 | 5 | 402 |
| 2018 - 2019 | 268 | 28 | 5 | 1 | 44 | 344 |
| 2019 - 2020 | 165 | 9 | 2 | 3 | 0 | 173 |
| 2020 - 2021 | 238 | 23 | 8 | 4 | 48 | 313 |
| 2021 - 2022 | 356 | 55 | 1 | 0 | 0 | 412 |
| 2022 - 2023 | 316 | 28 | 8 | 1 | 6 | 357 |
| 2023 - 2024 | 404 | 34 | 14 | 1 | 0 | 451 |
| **2014 to 2024** | **3593** | **301** | **42** | **60** | **168** | **4044** |
| Average per year  | 359 | 30 | 4 | 6 | 17 | 404 |

9.12.1 However, it should be noted that this does include years where delivery has been severely impacted by the Covid pandemic. A more accurate estimate of typical delivery can be drawn from omitting these years and instead extending the accounting period to include the previous 2 years from 2012 as set out below. This gives an average rate of 445 dwellings per annum which is directly comparable to the baseline Local Housing Need figure of 446 dwellings per annum.

***Historic Annual Housing Completions 1st April 2012 - 31st March 2024 (Excluding Years impacted by Covid)***

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Year completed (1st April - 31st March) | Total Dwellings delivered on New Build Sites | Net Additions through Conversion/ Change of Use | Net additions through permitted development | Demolitions | C2 Care Home additions (dwelling equivalent) | Total Net Completions |
| 2012 - 2013 | 423 | 13 | n/a | 2 | n/a | 434 |
| 2013 - 2014 | 438 | 17 | n/a | 1 | n/a | 454 |
| 2014 - 2015 | 448 | 19 | n/a | 42 | 25 | 450 |
| 2015 - 2016 | 540 | 23 | n/a | 5 | 2 | 560 |
| 2016 - 2017 | 510 | 34 | n/a | 0 | 38 | 582 |
| 2017 - 2018 | 348 | 48 | 4 | 3 | 5 | 402 |
| 2018 - 2019 | 268 | 28 | 5 | 1 | 44 | 344 |
| 2019 - 2020 |   |   |   |   |   |   |
| 2020 - 2021 |   |   |   |   |   |   |
| 2021 - 2022 | 356 | 55 | 1 | 0 | 0 | 412 |
| 2022 - 2023 | 316 | 28 | 8 | 1 | 6 | 357 |
| 2023 - 2024 | 404 | 34 | 14 | 1 | 0 | 451 |
| **2012 to 2024** | **4051** | **299** | **32** | **56** | **120** | **4446** |
| Average per year  | 405 | 30 | 3 | 6 | 12 | 445 |

9.12.1 The adoption of a new Local Plan which identifies readily available and deliverable sites will assist in boosting delivery moving forwards.

***9.13 Based on the housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption of the Plan?***

Council’s response

9.13.1 The estimated supply from specific deliverable sites is 2700 dwellings, within the first 5 years of the Plan post adoption. This is set out in answer to Questions 9.8 and 9.9 above.

9.13.2 The table included in answer to Qu. 9.7 also includes an estimated discounted rate for potential non-delivery, and an allowance for small site windfalls beyond 2027. The total estimated net supply for this period is 2868 dwellings from all sources.

9.13.3 The estimated supply is set out in the trajectories in Section 4 of the Housing Land Supply Position Statement, October 2024 [ADC.04]. The ‘Annual housing delivery from all sources’ table on page 15 of this document identifies delivery anticipated from years 1-5 (2023 to 2028), and also from years 3-8 (2025 to 2030). The latter has informed the 5YLS post adoption.

***9.14 Having regard to the questions above, will there be a five-year supply of deliverable housing sites on adoption of the Plan?***

Council’s response

9.14.1 Yes - See response to Qu. 9.11.

### Developable supply in years 6-15

***9.15 What is the estimated total supply of specific developable sites or broad locations for growth for years 6-10 and 11-15?***

Council’s response

9.15.1 The estimated supply is set out in the trajectories in Section 4 of the Housing Land Supply Position Statement, October 2024 [ADC.04]. The ‘Annual housing delivery from all sources’ table on page 15 of this document identifies the annual delivery anticipated across the Plan Period.

9.15.2 Years 6-10 post adoption (2030/31 to 2034/35) shows an estimated delivery from specific sites of around 2013 dwellings (with an additional estimate of 455 dwellings from small site windfalls).

9.15.2 Years 11-15 post adoption (2035/36 to 2039/40) shows an estimated delivery from specific sites of around 689 dwellings (with an additional estimate of 455 dwellings from small site windfalls).

9.15.3 However, as already discussed at paragraphs 9.2.4 to 9.2.6, estimating future delivery is not a precise science and actual delivery is likely to smooth out any peaks in the trajectory as the market delivers.

***9.16 What is the evidence to support this and are the estimates justified?***

Council’s response

9.16.1 Please see response to Qu’s 9.1, 9.2, 9.3.