Q5.6. Is the proposal in policy 3 to have a variable figure for the five year requirement consistent with national policy? Would it be effective in helping to ensure that the need for homes identified in the Plan can be met? If not, how should the five year requirement be calculated?

5.1 Calculating the five year housing land supply by reference to a supply target which has the potential to change on an annual basis is not consistent with national policy.

5.2 Delivering an adequate supply of new homes is fundamental to the efficacy of the Plan. Those homes are needed to both meet housing need and support the council’s economic growth aspirations. Maintaining a five year housing land supply is maintained is a crucial “check and balance” in the planning system to ensure that an adequate supply of new homes continues to be delivered.

5.3 Calculating the housing land supply by reference to a variable target introduces significant uncertainty in the minimum number of new homes that are needed each year. No local authority can effectively plan against a backdrop of such potential volatility in the housing requirement.

5.4 The council’s main justification for avoiding a fixed figure is to ensure that the Plan does not date. However, the Planning Practice Guidance (PPG) makes clear that local plans should be reviewed at least every five years or sooner if there is a significant change in circumstances. That provides more than adequate protection against the Plan “dating” whilst providing a period of certainty over which planning can actually take place.

5.5 As we explained in our response to Matter 2, we do not accept that it is appropriate to use the local housing need figure as the bottom end of the housing requirement range in any event. The council’s proposal to do so would appear to be contrary to the PPG, which requires an assessment of housing land supply to be carried out against the

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1 Paragraph: 062 Reference ID: 61-062-20190315
adopted strategic housing target. In order for the Plan to be sound, the five year housing supply should therefore be calculated by reference to the actual housing requirement of 920 dwellings per annum.

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2 Paragraph: 005 Reference ID: 68-005-20190722