



# **NUTFIELD GREEN PARK**

**5 YEAR HOUSING LAND SUPPLY  
NOTE**

**OCTOBER 2023**

## Tandridge's Five Year Housing Land Supply (5YHLS)

This statement has been provided within the context of the current Framework (published September 2023). Should the Government publish a revised Framework then we respectfully request the opportunity to comment on it.

The Council's latest position on its housing land supply is set out in the Authority Monitoring Report (AMR, 1<sup>st</sup> April 2021 to 31<sup>st</sup> March 2022). It provides over 20 different calculations. The difference between the calculations essentially relate to:

- The housing requirement to be used in the calculation;
- The application of a 5% or 20% buffer;
- How the shortfall against the proposed housing requirement should be addressed; and
- The inclusion or exclusion of proposed allocated sites in the draft Local Plan.

Notwithstanding the different calculations presented in the AMR, it is of note that at a public inquiry into an appeal made by CALA Homes against the failure of the Council to determine within the relevant timescales an application for 100 dwellings at land west of Limpsfield Road, Warlingham, the Council's position was that its deliverable supply equated to 1.57 years. The public inquiry took place in February and March 2023 and the decision notice was issued on 11<sup>th</sup> April 2023<sup>1</sup>.

Whilst the AMR provides calculations involving the proposed housing requirement and draft allocations in the draft Local Plan, the Local Plan Inspector's letter of 10<sup>th</sup> August 2023 is clear that the plan is either going to be withdrawn or found unsound.

The Applicant's approach to calculating the Council's housing land supply is in accordance with the Framework (2023) and associated guidance and is summarised below.

### Stage 1 – Identify the base date and the 5YHLS period

The base date of the Council's latest AMR is 1<sup>st</sup> April 2022 and the five year period is to 31<sup>st</sup> March 2027. Should the Council update its position during the determination of the application then we respectfully request the opportunity to comment further.

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<sup>1</sup> PINS ref: 3309334

## Stage 2 – Identify the figure the 5YHLS should be measured against.

In accordance with paragraph 74 and footnote 39 of the Framework, the Council's 5YHLS should be measured against the local housing need using the standard method as set out in the PPG. This is capped at 642 dwellings per annum.

## Stages 3 and 4 – Identify the past shortfall and how this should be addressed

Step 2 of the standard method already factors in the past shortfall as part of the affordability ratio and therefore there is no requirement to specifically address under-delivery separately as set out in paragraph 68-031 of the PPG<sup>2</sup>.

## Stage 5 – Apply the appropriate buffer

The Council's latest housing delivery test was significantly below 85% (it was 38%) and therefore in accordance with paragraph 74 and footnote 41 of the Framework, the 20% buffer applies.

## Stage 6 – Identifying a realistic and deliverable supply

The AMR claims that the deliverable supply is 1,212 dwellings excluding the proposed allocations in the draft Local Plan or 2,323 dwellings including the proposed allocations in the draft Local Plan. At the Warlingham appeal referred to above, the Council did not rely on the inclusion of the draft allocations. As above, it is likely that the draft plan is to be withdrawn or found unsound. Nevertheless, on either figure, the Council cannot demonstrate a 5YHLS by a significant margin as shown in the following table:

	Requirement	Without draft allocations	With draft allocations
A	Annual local housing need figure / requirement	642	642
B	Five year housing requirement (A X 5 years)	3,210	3,210
C	20% buffer (20% of B)	642	642
D	Five year supply to be demonstrated (B + C)	3,852	3,852
E	Annual requirement plus 20% buffer (D / 5 years)	770	770
	<b>Supply</b>		
F	Five year supply at 31 <sup>st</sup> March 2022	1,212	2,323
G	Supply in years (F / E)	1.57	3.02
H	Undersupply against the five year requirement	2,640	1,529

<sup>2</sup> Paragraph: 031 Reference ID: 68-031-20190722: "How can past shortfalls in housing completions against planned requirements be addressed?"

The Applicant considers that the deliverable supply is less than that claimed by the Council. With reference to the definition of “deliverable” set out in the Annex to the Framework, this is because the Council has not provided the necessary clear evidence for the inclusion of major sites without detailed planning permission, including the proposed allocations in the draft Local Plan. The Applicant reserves the right to comment on the deliverable supply further during the determination of the application. However, in the meantime, there is a significant shortfall in the 5YHLS even on the Council’s figures, which is addressed in the planning statement.