



Inspectors Issue 5:

**Will the Local Plan meet the housing requirement over the plan period?
 Will there be a 5 year supply of deliverable housing sites with an
 appropriate buffer?**

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| i) | Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity in the Strategic Housing and Employment Land Availability Assessment (SD12) reasonable and realistic? Is this assessment sufficiently comprehensive and rigorous having regard to the PPG on <i>Housing and economic land availability assessment (ID3)</i>? |
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1. Yes. The SHELAA has been prepared on the basis of the PPG with the details set out within the document. To illustrate this, it can be seen that the SHELAA contains a wide variety of sites derived from a range of sources, including from a comprehensive 'call for sites' exercise undertaken at the start of the plan-making process. The process has followed the guidance in respect of assessing suitability, availability and deliverability of sites through assessment of environmental constraints, and ownership and infrastructure requirements. Moreover, the views of landowners / site promoters / developers have been sought on sites which are to be allocated in the Local Plan in order to understand developer proposals for bringing sites forward and whether there are any practical issues that need to be resolved first. In respect of development capacity, the Council has made reasonable site-specific assumptions based on average densities taking account of individual site circumstances as far as possible – this is explained in more detail in response to question vii) below. Consideration of the SHELAA documentation will show that it contains reasonable and realistic assessments and assumptions, and that it follows the PPG, so that it is comprehensive and rigorous.

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| ii) | Are the sites relied upon for the supply of housing deliverable and developable in accordance with paragraph 47 of the NPPF? Does the evidence provided in Appendices 1 and 2 of the Housing Topic Paper (SD08) give sufficient confidence that sites will be delivered as anticipated? Is there an over-reliance on large site allocations? |
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2. As referred to in response to question i) above, the SHELAA is the principal vehicle where the deliverability and developability of sites has been assessed using the tests in footnotes 11 and 12 of the NPPF respectively and the associated PPG (ID3). The Council is fully satisfied that there are no significant constraints to any of the allocated

sites being developed given the delivery of M20 Junction 10a has been confirmed and construction is now under way.

3. The Housing Topic Paper (SD08) goes further by providing an updated, comprehensive, 'site by site' assessment of the planning status of every site contained within the Local Plan Housing Trajectory (Appendix 5). This includes (in Appendix 2 of SD08) the views of housebuilders / developers where these have been forthcoming on when they consider it likely that their sites will be brought forward and the rate of delivery once commenced. Where sites are under construction and delivering housing, the completion rates achieved have also informed the Council's expectations of how quickly those sites are likely to be built out. This information has helped to inform the Housing Trajectory which sets out the Council's expectations of when housing will be delivered over the Plan period. The Council has updated information on this assessment in an Addendum to the Housing Topic Paper which is appended to this Hearing Statement. This includes a reassessment of the realistic prospect of delivery of new housing over the 2018-23 period (see response to question v) below).
4. The overall scope of allocations in the Local Plan is influenced to a considerable degree by the contribution that existing commitments will be making to the delivery of housing. These include previously allocated sites with planning permission (including Chilmington Green) and extant windfall permissions on non-allocated sites. The evidence in the Housing Topic Paper (SD08) shows clearly that these sites are all currently delivering housing or are shortly expected to. These commitments account for 6250 units (45%) of the housing supply identified in Table 1 of the Submission Local Plan. When measured against the residual requirement from 2017-30, these commitments amount to over 48% of the total supply.
5. With regards to 'new' allocations in the Local Plan to 2030, there is a range of size and location of sites being allocated, in particular across the rural parts of the borough. This marks a deliberate departure from the previous approach of the Core Strategy which focused a large proportion of new development in two large urban extensions around Ashford, with a third to be subsequently identified in a review. There are no new allocations of anything like the size of the Chilmington Green and Cheeseman's Green / Waterbrook allocations in the Core Strategy, with only the site allocations at Court Lodge (S3) and Land north-east of Willesborough Road, Kennington (S2) being over 400 units. In the case of both S2 and S3, the Council has identified the key infrastructure issues with stakeholders and there are no impediments that would prevent either site from coming forward over the Plan period or from making a contribution to the 5 year housing land supply in the short to medium term. In both cases, there have been extensive pre-application discussions with the developers involved and planning applications are expected to be lodged soon. In the case of Court Lodge (S3), the intentions of the developers to bring the site forward for first completions in 2020/21 is set out in their representations to the Main Changes consultation in 2017 and contained as document 15 in Appendix 2 to the Housing Topic Paper. Overall, there is not a reliance, let alone an over-reliance, on large site allocations. The Local Plan contains a wide range of sites, including small sites, to provide a mixed and balanced approach whilst ensuring delivery.

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| iii) | What should be the starting date for the consideration of a 5 year supply? |
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6. The starting point for the assessment of 5 year land supply and any accumulated shortfall as part of that calculation should be 2011, which is the base date for the SHMA and the housing requirement figures in the Submission Local Plan.
7. With regards to the Local Plan examination and the evidence put forward by the Council in the Housing Topic Paper and its Addendum (see response to question v) below), the Council has focused on being able to demonstrate a deliverable 5 year housing land supply for the 2018-23 period. This is discussed in more detail in the response to questions (iv) and (v) below and the Addendum to the Housing Topic Paper.

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| iv) | How is any shortfall in delivery since the start of the plan period to be dealt with? Should this undersupply be dealt with within the first 5 years or over a longer period? Should the shortfall be calculated against the Strategic Housing Market Assessment (SD13) figure of 825 dwellings per annum or the annual housing target in Table 1 of 848 dwellings per annum? Is the application of a 20% buffer in addition to the annualised housing target and the shortfall since 2011 justified? |
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8. The Housing Topic Paper (SD08) sets out the approach to housing delivery since 2011 and states the shortfall against the OAN figure of 825 dwellings per year accumulated since that date. The Council considers that the 825 dpa figure is the appropriate one upon which to base any calculation of shortfall in delivery since 2011. This is because the additional 'future proofing' element of the housing target in table 1 of the Submission Local Plan is based on an allowance for future migration from London that is only considered under the Further Alterations to the London Plan to apply from 2017 onwards (see response to Issue 4 (ix)). Therefore, as this element does not form part of the OAN for the borough, it would not be appropriate for it to be applied before this point in the Plan period.
9. Para 194 onwards of SD08 then describes how the Council has sought to address the shortfall in completions against the Government guidance on the matter, which prefers (but does not require) rectifying the shortfall within a 5 year period – the so-called 'Sedgefield' method.
10. As housing delivery rates in the borough have not (with one exception) met the annualised OAN target since 2011, the Council accepts, for the present time, the application of the 20% buffer as set out in para 47 of the NPPF. This is expected to change as delivery rates increase in line with the trajectory and the need for only a 5% buffer is likely to be applicable within the next 5 years.
11. Based on a combination of the Sedgefield methodology and the application of the 20% buffer to the OAN and accumulated shortfall against the OAN annualised target from 2011-18 means that a total of 7,393 units would be required to be deliverable from 1st April 2018 to 31st March 2023 in order for a 5 year housing land supply to be demonstrated. As shown in the Housing Topic Paper (SD08) at para. 213, the expected supply of housing over this period set out in the Local Plan Housing trajectory is 7,618

units. This demonstrates that, even on the basis of the what is expected to happen as set out in the trajectory (see the response to question (v) below), rectifying the whole shortfall since 2011 and the delivery of the OAN based target with a 20% buffer is achievable, so the Council believes it can demonstrate a deliverable 5 year housing land supply on a Sedgefield basis from 2018.

12. In reaching this position, the Council has sought to plan for early delivery of new housing development across the borough as shown in the housing trajectory, whilst remaining consistent with the overall model of sustainable development proposed in the Plan's strategy. The opening to traffic of M20 Junction 10a in August 2019 will remove the major strategic constraint to new development coming forward around southern and eastern Ashford and therefore schemes in these areas will be able to proceed and be build out expeditiously thereafter, in addition to those committed developments able to proceed utilising the remaining capacity at the existing Junction 10.
13. Nevertheless, the Council accepts that the housing trajectory, on its face, indicates a swift and significant anticipated increase in house building rates in the borough and especially in Ashford itself. Therefore, whilst on an individual site-by-site basis, there is at least a realistic expectation that sites will deliver in the timescales and at the rates anticipated, there may potentially be room for some doubt as to whether the wider market for housing in Ashford (in particular, the town of Ashford and its environs) would be able to absorb such a significant increase over a relatively short space of time.
14. Similar scenarios have been rehearsed recently at the Local Plan examinations in the neighbouring districts of Canterbury, Swale and Maidstone, where it is reasonable to presume that general housing market absorbability would be similar to that in Ashford.
15. In all three cases, the Local Plan Inspectors agreed that it would be more appropriate for any housing shortfall to be spread over a period longer than 5 years and in two cases, at Canterbury and Swale, that it should be spread over the whole of the remaining Plan period (the so-called 'Liverpool' approach).
16. This was based on two principal factors. Firstly, the Inspectors noted that, in order to rectify the shortfall over the initial five years following adoption, it would require a very significant increase in housing completions, especially in years 4 and 5, as newly allocated sites started to deliver new housing on the ground. The realism of this approach in general housing market terms was queried by the Inspectors.
17. Secondly, and related to the first factor, was the risk that pursuing a Sedgefield approach to shortfall would present to the wider Local Plan strategy where the failure of the housing market to deliver a step change in the level of completions over a relatively short period could add to the pressure to release yet more sites for housing in less sustainable locations as a consequence of the 5 year land supply arithmetic.
18. Unlike those neighbouring authorities, the Council has confidence that a Sedgefield approach to addressing the housing delivery shortfall can work in a sustainable way but it is not without some risk. The likelihood of delivering at least the borough's housing requirement over the Plan period is high given the flexibility of the additional 1,000 units identified in Table 1 of the Local Plan (a figure which is now higher – see the response to question vi) below) but applying the Sedgefield approach to the shortfall results in the need to deliver over 2,000 additional dwellings beyond the annualised OAN requirement over the next five years without the additional 20% buffer. If the buffer is included too, this results in an annual average of 1,479 dwellings over the next 5 years.

19. It is of course worth noting that the need for a 20% buffer in a 5 year housing land supply calculation in the NPPF does not mean that significantly more extra housing should be allocated or permitted but instead is used to improve the chances of fulfilling the Plan's housing requirement on the ground. This may best be achieved by bringing forward sites from later in the Plan period. However, in circumstances such as in Ashford where the Council has sought to front-load the Local Plan to a large degree, the consequences of the 20% buffer requirement would inevitably result in further land needing to be identified for housing in locations where the housing market had a reasonable prospect of delivering completions in the short term whilst also meeting all the other footnote 11 tests. This effect is exacerbated by taking a Sedgefield approach to the shortfall given the buffer applies to the whole of the shortfall as well as the annualised OAN requirement.
20. The evidence contained in the SHMA and on the 'market signals' uplift in housing delivery set out in paragraphs 63 – 67 of the Housing Topic Paper (SD08) indicates that Ashford is already in the top 10% of local authorities nationally in respect of the annual rate of housing growth. The 5% uplift for market signals contained within the OAN would place it in the top 1%. It is therefore self-evident that to achieve the necessary rate of housing growth to deliver a full OAN plus all the shortfall and a 20% buffer over the next 5 years would require an even higher rate of annual growth.
21. The Council's strategy for the distribution of housing development in the borough is explained in the Housing Topic Paper (SD08) and alternatives involving a greater proportion of both housing development per se, and housing in the rural areas of the borough, have been explored and assessed through the SA process (see response to Issue 2/3 (i)). Whilst the Council believes that a Sedgefield approach to meeting a 5 year housing land supply can be achieved, there is inevitably a greater risk that housing completion rates may fail to match expectations and thus it becomes more difficult to demonstrate a 5 year housing land supply in the years ahead. If this were to be case then the evidence points clearly towards the rural parts of the borough as the likely locations for additional release of land as there will be greater chance for market absorption in those areas as opposed to land within or on the edge of Ashford itself.
22. In circumstances where there is a significant buffer already in place to enable the overall housing requirement in the Plan to be delivered, additional rural development as a means to seek to recover any shortfall over a shorter period of time would not be justified, as this would undermine the wider sustainable pattern of development promoted in the Local Plan and is not required to help meet the overall Plan target.
23. In conclusion, given the approach taken recently by Local Plan Inspectors in neighbouring districts, if the Inspector has any concerns about the housing land supply position including, in particular, anything flowing from the use of the 'Sedgefield' approach to shortfall and the potential consequences arising in respect of the need for additional development in the rural parts of the borough, the Council would invite the Inspector to give strong consideration to the application of a 'Liverpool' approach to the rectifying of housing shortfall since 2011 in the Local Plan or, at least, an approach which proposes to rectify the shortfall over a longer period than the next 5 years. This would be a far more sustainable approach than seeking additional housing land supply in the borough in the short to medium term.

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| v) | Is the housing trajectory at Appendix 5 realistic and does it form an appropriate basis for assessing whether sites are deliverable in line with footnote 11 of the NPPF? |
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24. In accordance with paragraph 47 of the NPPF, the housing trajectory sets out the expected (our emphasis) rate of housing delivery across all sites across the Plan period, whether they are existing commitments or new allocations. This rate of delivery is based on a comprehensive evidence base that has assessed the factors of ‘deliverability’ referred to in footnote 11 of the NPPF (availability, suitability and viability, etc) which is contained in various background documents to the Submission Local Plan, notably the SHELAA (SD12), Sustainability Appraisal (SD02) and the Housing Topic Paper (SD08).
25. Furthermore, it has been informed by reference to the correspondence received from developers and site promoters set out in Appendix 2 to the Housing Topic Paper and the other evidence of progress on a site by site basis, whether that is pre-application discussions, the making of a planning application or the granting of planning permission. There are also regular and on-going informal discussions with developers and promoters.
26. The trajectory sets out “the expected rate of housing delivery” in accordance with the 4th bullet point of paragraph 47 of the NPPF. This shows what is expected to happen, ie what is probable. The 2nd bullet point of paragraph 47 requires a supply of “deliverable” sites to be identified, as defined in footnote 11. Footnote 11 requires there to be “a realistic prospect that housing will be delivered on the site within five years”. The Court of Appeal in the case of *St Modwen v SSCLG* [2017] EWCA Civ 1643 states that the “realistic prospect” test “does not mean that for a site properly to be regarded as “deliverable” it must necessarily be certain or probable that housing will in fact be delivered upon it, or delivered to the fullest extent possible, within five years” (para 38). The Court of Appeal went on to confirm that a trajectory, prepared on the basis of what is expected to happen, is different from the assessment of five year supply which is prepared on the basis of what has a realistic prospect of happening (paras 36 and 39).
27. It should be recognised that whereas the trajectory sets out the Council’s expectations on housing delivery, in some instances there is a material difference if one considers what the ‘realistic prospect’ of delivery might be.
28. This is already referenced in the Housing Topic Paper (SD08) at paras. 215 – 217 as is the intention for the Council to produce a ‘realistic prospect’ based 5 year housing land supply position, distinct from the trajectory.
29. The distinction with a housing trajectory basis for 5 year housing land supply has been drawn in recent appeal decisions, for example in appeal ref: APP/J2210/W/17/3175031 - Land adjacent Thanet Way, Whitstable. In discussing the 5 year housing land supply position, at paragraph 26 of his decision letter, Inspector Felgate stated the following, “*..as the St Modwen judgment makes clear, the purpose of the 5 year supply calculation is not to predict how many houses will be delivered, but only to show how many could be. That exercise does not require certainty. Instead it requires only a realistic prospect, and that is a significantly lesser test.*”
30. Therefore, the Council has reviewed the available evidence to assess where there is a realistic prospect that more housing may be delivered on sites in the 2018-23 five year housing land supply period than the housing trajectory is expecting. This is set out in

detail in the Addendum to the Housing Topic Paper.

31. The result of this exercise indicates that when the Council considers the realistic prospect of housing delivery on a site by site basis, plus delivery from extant permissions and unidentified windfall sites, a 5 year housing land supply of over 9,000 dwellings for the 2018-23 period can be demonstrated. This equates to a 6.12 year housing land supply using the Sedgefield approach to the shortfall since 2011 and a 20% buffer.

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| vi) | Does the contingency buffer of over 1,000 dwellings provide sufficient flexibility to accommodate unexpected delays whilst maintaining an adequate supply? |
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32. The contingency buffer in Table 1 of the Submission Local Plan represents approximately 8% of the residual requirement from 2017-30 of 12,943 units. This represents a generous safeguard against market fluctuations over time and should provide a high level of confidence that the objectively assessed housing need for the borough identified in the SHMA will be achieved by 2030. The buffer is even greater if the 'future proofing' housing being provided to meet additional out migration from London over the Plan period (see response to Issue 4 (viii)) is discounted as this does not form part of the objectively assessed housing need figure.
33. As paragraph 76 of the Housing Topic Paper (SD08) makes clear, this scale of contingency buffer means that not every site in the housing trajectory needs to come forward as predicted in order for the housing requirement in the Plan to be met. Should all the buffer come forward by 2030, then this will contribute significantly to an even greater boost to the supply of housing in the housing market area, consistent with Government policy.
34. In fact, the scale of the buffer has grown over the 12 months since the figures in Table 1 of the Plan were last calibrated. Based on the predicted completions in 2017-18 of 562 dwellings set out in the Addendum to the Housing Topic Paper, as the residual housing requirement to 2030 has reduced to 12,381 the level of housing supply from all sources (allocations and windfalls) has not decreased to the same degree. The re-calibrated figures are shown in the Addendum to the Housing Topic Paper and demonstrate that the contingency buffer over the Plan period has risen to 1,405 units (based on the same cautious approach to discounting extant windfall permissions by 25%). For five year land supply purposes, where save for site-specific reasons all extant planning permissions may be regarded as having a realistic prospect of being delivered, the Plan's contingency buffer would be 1,601 units.
35. This demonstrates the Council's willingness to continue to grant windfall residential planning permissions despite the significant contingency buffer already embedded in the Local Plan and further reduces any reliance on all sites in the trajectory needing to deliver at the scale and pace that is currently expected in order to achieve the Local Plan's housing target.

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| vii) | Has the Council made reasonable assumptions about average densities in Table 1 of the Strategic Housing and Employment Land Availability Assessment (SD12) bearing in mind PPG advice (ID3-017-20140306)? Has this been translated into the capacity estimates for allocated sites? |
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36. Yes, when calculating density assumptions in the SHELAA and for the Local Plan allocations the Council has followed the guidance in paragraph 47 of the NPPF and PPG advice (ID3-017-20140306). The SHELAA section 'Identifying the Development Potential of each Site/Broad Location' (SD12 Page 17) explains the context in which the density assumptions were calculated. In summary, the assumptions used in the currently adopted development plan documents were considered too high, and were not being delivered in practice. This was due to a number of factors which include the economic downturn and the introduction of residential space and parking standards. It was unrealistic to take these out of date assumptions forward into the updated SHELAA and Local Plan 2030 process.

37. Using the guidance of PPG: '*relevant existing development schemes can be used as the basis for assessment, adjusted for any individual site characteristics and physical constraints*' work was undertaken to assess the density of major schemes actually being permitted and delivered across the borough during 2014/15. An average of these densities was then calculated for each broad location, also taking into consideration individual site characteristics and the on-site infrastructure requirements of the scheme where possible. These density calculations formed the assumptions in Table 1 and were applied to all sites assessed through the SHELAA. In order to evaluate whether these density assumptions remain reasonable, an updated density assessment has been undertaken using recent 2016/2017 permitted applications/built developments. The results of this work show that the applied density assumptions in Table 1 remain broadly accurate.

38. When progressing sites from the SHELAA site survey, into the Local Plan process for allocation, the standard site densities were adjusted to take into account any additional individual site characteristics and physical constraints which were highlighted during the Sustainability Appraisal site assessments (SD02). These revisions to site capacities or densities were then translated through to the Local Plan allocations, and any constraints or reasoning for a particular density is explained within supporting text of the individual site policy where the Council felt this was required. Evaluation work has been undertaken on all site allocations proposed densities which indicates that these are broadly in accordance with the density assumption in Table 1, and where they are inconsistent, this is explained through analysis of the individual site in the supporting text.

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| viii) | Is the approach to windfall sites justified having regard to paragraph 48 of the NPPF? Why is it assumed that there will be 150 windfall units in 2021 and 100 from 2022-2030? Having regard to paragraph 48 of the NPPF should windfall sites be included in the 5 year supply? Is the 25% non-delivery rate of extant windfalls reasonable? |
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39. Yes, the approach in the Local Plan is consistent with paragraph 48 of the NPPF. There is 'compelling evidence' relating to the reliability of supply and the approach is 'realistic'

having regard to the SHLAA, past delivery rates and expected future trends.

40. The reliability of supply is clearly demonstrated through the nature of past delivery. Monitoring data shows that 2,122 residential windfall dwellings have been completed in the borough since 2005. This equates to an annual average of 177 units per year, over a 12-year period. There is little doubt that housing windfalls will continue to be delivered at a similar or higher rate over the plan period on account of continued 'permitted development rights' and through the application of Policies HOU3a and HOU5 which adopts a less restrictive approach to housing windfall delivery than previously.
41. Also of relevance is the SHELAA which shows that over 700 sites were promoted for inclusion in the Local Plan as part of the 'call for sites' exercise. This shows that a potential supply of sites remain. Some of these sites, or parts of them, may well come forward as suitable windfall housing schemes in the future.
42. Due to these factors, it is entirely reasonable that the Local Plan relies on 100 windfall dwellings per year between 2022 and 2030 to meet the Plan's housing target - an annual supply that is much lower than what has actually been delivered over a 12-year period. The 150 assumption in year 2021 reflects the preceding three year assumptions which are based on extant permission coming forward, minus a 25% reduction. The justification for this reduction is set out under paras 182 – 189 of the of the Council's Housing Topic Paper (SD08).

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| ix) | Does the Local Plan contain a housing implementation strategy describing how delivery of a five year supply of housing land to meet the housing requirement will be maintained in accordance with paragraph 47 of the NPPF? |
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43. The approach to housing implementation is covered in the supporting paragraphs to policy SP2 in the Submission Local Plan. In particular, the strategy for allocating new housing sites has taken clear account of deliverability (as evidenced through the SHEELA and SA and reinforced in the Housing Topic Paper and its appendices). In this sense, the Council has sought to front-load as much of the housing land supply as possible, or at least allow it to come forward as early as it can, with only two sites (S24 and S45) phased in policy to follow the delivery of adjacent larger housing developments on the Tent1a and S14 sites respectively.
44. As stated elsewhere, the Council's expectations for housing delivery are expressed in the housing trajectory (Appendix 5 of the Submission Local Plan). The detailed site allocations made in the Local Plan indicate how and where the Council proposes housing to come forward across the borough in order to deliver a sustainable model of growth.
45. Para. 3.38.5 of the Submission Local Plan states that housing completions will be monitored on an annual basis and that, if a shortfall that cannot be easily rectified in the short term becomes apparent, then an earlier review of the Plan would be expected.
46. As part of any annual monitoring exercise, and in any event, there will be a need for on-going liaison with developers and housebuilders to ascertain how sites are progressing and whether there are any impediments to development emerging that the Council can assist with resolving. As part of this process, the Council chairs a quarterly Strategic Delivery Board which includes key public sector partners such as KCC, Highways

England, Homes England and the Skills Funding Agency whilst there are also close links with the South East LEP through the Kent & Medway Economic Board.

47. It is also intended that an Affordable Housing trajectory is established to monitor the delivery of affordable housing against once the relevant policies in this Local Plan have been adopted.

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| x) | How would the supply of housing sites be monitored and managed? |
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48. Chapter 6 of the submitted Local Plan (SD01 - pg330) sets out the council's overall position on monitoring. The Council will continue to produce an annual Authority Monitoring Report (AMR – GBD02) which will provide an update on the delivery of each indicator that has been set out in Appendix 6 of the Local Plan (SD01 - pg364).

49. The housing indicators included within Appendix 6 are likely to be the most important tools for monitoring the supply of housing sites, particularly as the first three indicators of the monitoring framework are concerned with Policy SP2 (SD01 – pg27) and the strategic approach to housing delivery. In order to gather information on these indicators for the AMR, it will be important to conduct a Housing Information Audit (HIA) at the end of each monitoring year (31st March). This will ascertain how many housing completions have come forward in the borough in a given year, but will also provide vital information on how the sites allocated in the Plan are delivering when compared with the timescales set out in the trajectory (SD01 – pg362). In short, the Local Plan monitoring process includes mechanisms for a wide-ranging overview of housing delivery.

50. With regards to managing the future supply of housing sites, and considering requirements for a review of the Plan and the need for additional sites in the future. This consideration is covered in part by the SHELAA (SD12), which provides a broad indication of suitable sites within the borough and will be updated annually. At this moment in time, the SHELAA details all of the sites that may be suitable for housing, so will be a vital dataset for any reviews of the Plan going forward. All of the sites are listed in Appendix 1 of the SHELAA document (SD12).

51. Paragraph 6.5 of Chapter 6 in the Plan (SD01 – pg330) refers to the council's position if key elements of the strategy are not being delivered. Here it is noted that the council will undertake short-term formal reviews of the Plan if it is clear from the monitoring report that key elements of strategy are not being delivered. This management approach is reiterated in paragraph 228 of the Housing Topic Paper (SD08 – pg37), which states that if housing completions are consistently falling below what is expected then an early review of the Local Plan will be triggered to address the shortfall.