

## Note to the Inquiry

### Re Five Year Housing Land Supply clarification

1. Mr Taylor raised concern at the Housing Land Supply Round Table that an additional 222 dwellings should be added to the requirement because the monitoring 'year' April 2019 to March 2020 was actually a monitoring period of 15 months (April 2019 to June 2020) due to the Covid-19 pandemic.
2. Mr Taylor is correct that the monitoring data for the 2019-20 monitoring year covers a 15-month period because the yearly housing count was undertaken three months later than it would normally have been undertaken.
3. The primary reasons for this approach are referenced in the 5 Year Housing Land Supply Statement appended to Inquiry document CD7.24 and dated 25 January 2022, with Covid-19 providing what were exceptional circumstances nationally.
4. The Council accepts that it has not yet reverted back to its previous 1<sup>st</sup> April to 31<sup>st</sup> March monitoring dates. It has not yet been able to. The Council intend to do this in the future, as we have done for all pre-COVID positions. Doing so will mean the five-year calculation can 'revert' back to the traditional timeframes. In doing so, one of the monitoring years will only be able to cover a 9-month period of housing completions.
5. However, the Council does not agree that component parts of the five-year housing land supply calculation undertaken for the July 2020 5YHLS Statement should in some way or in effect be retrospectively altered to reflect a longer monitoring year.
6. Firstly, the Council have always sought to keep the variables of the calculation consistent throughout the process, but the circumstances of Covid-19 were exceptional.
7. Secondly, the Council are not required to deliver housing on a month-by-month basis. The methods associated with five-year housing land supply, the housing delivery test (HDT), housing monitoring and housing returns, all relate to a year of housing completions, as reflected in Policy SP2 of the Local Plan which refers to '*an annual housing target*'.
8. The housing demand side of the assessment can only ever relate to a yearly target. It cannot be applied any differently by virtue of its context. Neither the NPPF or the PPG requires housing delivery rates to be delivered in a consistent way for good reason, because in reality they will fluctuate through a year (what

matters is what is recorded at the end of the year). Accordingly, there is no month-by-month housing number to 'keep pace' with and the housing demand side of the calculation cannot be extrapolated evenly over the year, nor can it be increased by a three-month period as has been suggested.

9. The borough wide count to monitor yearly completions can only reflect what is on the ground, with no valid means of backdating such data or assuming a house was finished by April. Moreover, any attempt to retrofit would be unproductive (see paragraph 17 of the 5 Year Housing Land Supply Statement appended to Inquiry document CD7.24 and dated 25 January 2022).
10. In any event, the 'disputed' three-month period was at the height of the pandemic during which construction and general housing industry activity was virtually stagnant. Even if the Council were to not seek to revert back to an April date in the future, as a means of somehow claiming these three additional months over a five-year period, what would the actual gain be? In practice, the Council's view is that it would be negligible.

**Ashford Borough Council - Planning and Development Service - Plan Making and Infrastructure – 21 February 2022**