

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

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 Housing and economic land availability assessment (ID3)?

- 5.1.1 We have already commented in our response to issue 3 of our disquiet about the manner in which the SHELAA has failed to consider the extent to which concerns it has expressed – such as impacts on landscape and accessibility - might be resolved or mitigated through selective development of parts of sites, the incorporation of landscape buffers, liaison with the highway authority and other measures. Lichfields in their Review of Housing Supply and Trajectory that is appended to this statement have undertaken a similar exercise to illustrate the inconsistency between the assumptions made concerning suitability and achievability of the Wates Developments' site at Appledore Road/Woodchurch Road (TS3) and the Local Plan allocation Policy S24 - Tenterden Southern Extension Phase B (TSTR W1).
- 5.1.2 Given the above and attached we do not believe the assumptions and analysis regarding site suitability, availability and achievability in the SHELAA to be reasonable or realistic. Nor do we consider the assessment sufficiently comprehensive and rigorous having regard to the PPG on Housing and Economic Land Availability Assessment.
- 5.1.3 We also note that a number of sites passed the SHELAA screening process to be placed in appendix 5 i.e. as housing sites remaining as part of the Housing Land Supply (HLS). Whilst not all these sites were then taken forward it is clear that if the unreasonable assumptions about, in the case of the land at Appledore Road/Woodchurch Road the achievability of the site were revisited, this could help bolster the HLS position in the five year period and across the housing trajectory. In this regard it is clear in appendix 5 that the land at Appledore Road/Woodchurch Road was deemed developable beyond the plan period as it is identified as delivering 250 dwellings beyond 2030.
- 5.1.4 The same is true of the way in which those sites that were deemed suitable for assessment in the SA were assessed. In this regard we note that appendix 4 of the SA concludes that both the land at Appledore Road/Woodchurch Road and Land at Belgar Farm (TS2) were not suitable for development, yet permission was granted on appeal for the latter and it now forms part of the housing land supply – a clear example of a situation where identified constraints in the SA have not proved obstacles to the grant of planning permission.

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?

5.2.1 Para 47 (bullet point 2), is clear on the need for LPA's to *'identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements'*. Deliverable is defined as *'sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.'*

5.2.2 Having regard to the above we note that appendix 5 of the ABLP includes the following in the 5 year HLS for 2017/18 – 2021/22 and 2018/9 to 202/23.

Supply ¹	2017/18 – 2021/22	2018/19 – 2022/23
Town centre sites	511	879
Chilmington green	600	800
Existing urban allocations under construction	1071	861
Existing urban allocations not started	789	974
New urban site allocations	1140	1625
A20 corridor new allocations	200	250
Existing rural allocations under construction	279	170
Existing rural allocations not started	288	348
New rural site allocations	855	855
Neighbourhood plan sites	157	157
Windfalls	799	699
Total	6,689	7,618

5.2.3 Appendix 1 of the HTP provides a helpful summary of consents and what is being built out, but provides little justification for why allocations (particularly re-allocations) will come forward at the point envisaged. Whilst appendix 2 includes emails from agents/landowners confirming when and how many dwellings a site will deliver, should not in our opinion be taken as read by the Council – it needs to be sense checked.

5.2.4 In the context of the above, given the commentary on the HLS in appendix 1 of the Housing Topic Paper (HTP), we would highlight the fact that a number of sites identified as deliverable/ delivering in the next 5 years (which is 2017/18 – 2021/22 as far as the figures in appendix 1 of the HTP is concerned), are dependent upon resolution of the M20 junction 10a issue, and that many of those that are proposed allocations that have yet to be subject to a planning application, yet are in some instances expected to deliver over 100 dwellings in the next 5 years i.e.
 Land NE of Willesborough Rd, Kennington (Policy S2): (150 dwellings in the 5 year HLS),
 Land at Court Lodge (Policy S3) (140 dwellings in the 5 year HLS),

¹ This assumes all those sites identified in the housing trajectory in the submission plan come forward as suggested by ABC – which is not actually a position we concur with.

Land south of Pound Lane, Kingsnorth (Policy S5) (150 dwellings in the 5 year HLS), Park Farm South East (Policy S14) (210 dwellings in the 5 year HLS), Waterbrook (Policy S16) (120 dwellings in the 5 year HLS), and Eureka Park (Policy S20) (210 dwellings in the 5 year HLS).

- 5.2.5 Similarly there are others where developers have yet to submit a planning application and where no developer commitment has been provided, that are expected to deliver in excess of 150 dwellings in the next 5 years i.e. Land adjacent to Poppyfields Charing (Policy S55) (180 dwellings in the 5 year HLS).
- 5.2.6 Others such as the land that forms Tent1B (policy S24) (70 dwellings in the 5 year HLS), have no application in, has no developer commitment to what is suggested and is, we understand, subject of a covenant which means it cannot be developed until 2028.
- 5.2.7 Whilst we are not suggesting these sites will not ultimately deliver we are questioning the rate of delivery over the next 5 years given their current status. In this regard we also note that ABC themselves have highlighted on p44 of the HTP that the outline permission for the land at Chilmington Green took 5 years to achieve – having been submitted in 2012 and granted at the beginning of the 2017.
- 5.2.8 The time taken in securing a consent, land acquisition, upfront infrastructure works and initial site preparation works can be time consuming. The Lichfields report - Start to Finish - How Quickly do Large-Scale Housing Sites Deliver (November 2016) highlights the fact that small sites (less than 500 dwellings) can take just over 18 months to deliver the first home after planning approval. ²
- 5.2.9 We would also question whether 799 windfalls should be included within the 5 year HLS. A point we return to in response to question viii.
- 5.2.10 Given the above we would suggest that it is highly unlikely that ABC will deliver the number of dwellings suggested in the first 5 years of the plan and that a contingency of at least 10% should be factored in to account for delays/ lapse rates. i.e. that rather than the 6,689 ABC have identified as being deliverable in the period 2017/18 – 2022/23 the plan is more likely to deliver circa 6,191 dwellings, and that sites to accommodate a shortfall need to be identified. The scale of the shortfall being dependent upon whether one accepts the Sedgefield or Liverpool method and ones position on the housing requirement. Please refer to appendix 5.1.
- 5.2.11 Turning to the issue of where a site is developable over the plan period, the NPPF defines developable as sites situated in a suitable location for housing development and where there is a reasonable prospect that the site is available and could be viably developed at the point envisaged. Again having regard to the site assessments in the HTP we would query whether reallocated sites such as Gasworks Lane (Policy TC14/S10) (159 dwellings), and the Former Klondyke and Newtown Works Phase 2 (Policies S6 and S7): (350 dwellings) will go on to deliver – both have significant

² See table 4 of Lichfields report Start to Finish - How Quickly do Large-Scale Housing Sites Deliver (November 2016)

issues that need to be addressed before they can deliver, both have been allocated for in excess of 5 years and both should thus should be treated with caution/ as part of the buffer rather than the defined supply.³

5.2.12 In addition to the above all the proposed allocations should at this moment be treated with some caution as they have yet to be examined and found sound. Some are subject to considerable opposition and may not ultimately be allocated.

iii) What should be the starting date for the consideration of a 5 year supply?

5.3.1 Whilst the most recent monitoring year for which there is up to date completions data should be the base date for the calculation of 5YHLS, in this instance 2017/18, and the figures in appendix 1 of the HTP refer to this period, this monitoring year will end on the 31st March 2018 and we will enter the monitoring year 2018/19. As the plan is also likely to be adopted in 2018 there is no reason to not consider a more up to date 5YHLS position commencing in 2018/19, provided it is based on accurately recorded completions data and not forecast completions. In this regard we note that para 209 of the HTP suggest that the Council only has a marginal 5YHLS position from a base date of 2018/19 of 5.05 years or +72 dwellings, a point we will return to.

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?

5.4.1 In my issue 4 statement I have identified a shortfall of 1,911 dwellings against the annual housing target of 848dpa since the start of the plan period. Adjusting this to reflect the SHMA figure of 825 would reduce the deficit to 1773⁴, a difference of 138 dwellings, albeit I consider the annual housing target of 848dpa should be the target against which the annual supply is measured – not the SHMA figure of 825. To use the SHMA figure would effectively make a nonsense of the future proofing the plan has sought to provide for.

5.4.2 In this context it is not immediately clear how the shortfall in housing delivery since 2011 is being dealt with over the course of the plan period. There appears to be contradictory information in the Plan and supporting evidence. Policy SP2 and para 3.37.7 of the ABLP promote the Liverpool method, whilst the HTP from para 190 supports the Sedgfield method. Albeit para 197 of the HTP caveats this by implying alternative approaches might be appropriate. Notwithstanding, the HTP suggests that the council can demonstrate a 5 year land supply based on Sedgfield, contradicting

³ Land at Gasworks Lane is allocated pursuant to policy TC13 in the Ashford Town Centre Area Action Plan Adopted February 2010 and the Former Klondyke and Newtown Works is allocated pursuant to policy U2 in the Urban Sites and Infrastructure Development Plan Document Adopted October 2012

⁴ Para 3.37.1 of the ABLP refers to a housing delivery shortfall of around 1,770 dwellings as of April 2017,

the Plan's contention that such an approach would require unrealistic annualised levels of completions.

- 5.4.3 As set out in my response to issue 4 (ix) PPG is clear in that *“Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible.”* The Sedgefield method. Thus any shortfall since the start of the plan period should be dealt with within the first 5 years. There is, as set out in Lichfields accompanying report, no justification for spreading it across a longer period/ the whole plan period.
- 5.4.4 The application of the 20% buffer is justified and consistent with national policy. Paragraph 47 of the NPPF states that *“Where there is a record of persistent under delivery of housing Local Planning Authorities should increase the buffer to 20%”*. Table 4.12 of my reps on issue 4 clearly show a record of persistent under delivery of housing. A point ABC appear to acknowledge and accept. Lichfields accompanying report provides further evidence as to why the 20% buffer is justified in this instance.

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?

- 5.5.1 Whilst we have already commented upon the deliverability point and footnote 11 of the NPPF above, we would comment here upon the delivery rates expected in the housing trajectory. The Lichfields report - Start to Finish - How Quickly do Large-Scale Housing Sites Deliver (November 2016) indicates that whilst larger sites deliver more homes each year, even the biggest schemes (those with capacity for 2,000 dwellings) will, on average, deliver fewer than 200 dpa, albeit their average rate – 161 dwellings per annum – is six times that of sites of less than 100 dwellings (27 dwellings per annum). It also indicates that *‘annual average delivery on sites of up to 1,499 dwellings barely exceeds 100 dwellings per annum, and there were no examples in this category that reached a rate of 200 per annum’*.
- 5.5.2 The Lichfields report also indicates that:
‘on average, a site of 2,000 or more dwellings does not deliver four times more dwellings than a site delivering between 100 and 499 homes, despite being at least four times the size. In fact it only delivers an average of 2.5 times more houses. This is likely to reflect that:
- *it will not always be possible to increase the number of outlets in direct proportion to the size of site – for example due to physical obstacles (such as site access arrangements) to doing so; and*
 - *overall market absorption rates means the number of outlets is unlikely to be a fixed multiplier in terms of number of homes delivered.’*
- 5.5.3 Having regard to the above and the appended Lichfields report, the delivery rates suggested for the likes of Chilminton Green, the Former Powergen site, Finberry, Land NE of Willesborough Road and Court Lodge Kingsnorth in appendix 5 of the ABLP would appear overly optimistic, as would some of the other sites – unless they are operating multiple outlets – as proposed at Park Farm South.

- 5.5.4 The fact that sites of 500+ dwellings make up 40% of the total housing trajectory is such that if there is any delay in the projected delivery of these sites, it would significantly impact on the ability of the trajectory to meet its housing target.
- 5.5.5 To this end the Lichfields housing supply review (appended), suggests that rather than 2,500 dwellings, a more reasonable total dwelling completions figures for Chilminton Green to 2030 would be c.2,170 homes, with annual delivery rates in the latter half of the trajectory of circa 200dpa from the site. This would be a reduction of 330 homes from the trajectory. Lichfields report also suggests that total dwelling completions figures for Land NE of Willesborough Road and Court Lodge Kingsnorth should be reduced from 700 to 620 and 950 to 730 respectively, a reduction of 300 dwellings.
- 5.5.6 Whilst Lichfields acknowledge that as neither the Former Powergen site nor the Finberry site include completions right up to the end of the plan period, the fact the projected build-out rates for both are not likely to be realistic is unlikely to affect the overall total supply within the plan period; their report does highlight the fact that this could push delivery rates further back into the plan period, which could impact upon the year housing land supply.
- 5.5.7 Given the above we would suggest that further sites need to be identified now if both the 5 year HLS and the overall housing target is to be met.

vi) Does the contingency buffer of over 1,000 dwellings provide sufficient flexibility to accommodate unexpected delays whilst maintaining an adequate supply?

- 5.6.1 Whilst the inclusion of a buffer is welcomed, we would question whether this is in fact going to be sufficient as, as set out in the Lichfields report, the trajectory appears to be unduly optimistic about the delivery of strategic sites. There is a significant body of evidence that planning permissions do not consistently translate into completions on site. Indeed, this is the basis on which the Letwin Review is founded to look to explain the gap between the number of planning permissions granted against those built in areas of high demand, with absorption rates (such as discussed in the Lichfields report for Chilmington Green) a key area identified for further investigation within his interim findings. This should be factored into any trajectory to ensure it can adhere to the requirements of the Framework (para 14) and have sufficient flexibility to adapt to rapid change.
- 5.6.2 If the Council has local evidence on the conversion rate of permissions to completions in Ashford this would be a useful indicator against which to assess the robustness of the trajectory. Nationally, Lichfields research entitled 'Stock and Flow Planning Permissions and Housing Output' indicates that permission was granted for 261,644 new homes in 2015 in England, whilst net completions in 2015–16 amounted to 189,650 (of which 163,940 were new build). Similarly in a presentation given by a DCLG Planning Director (Ruth Stanier) to the HBF Planning Conference in September 2015, DCLG presented research findings that suggest that 10-20% of permissions do not materialise into a start on site for a number of reasons. In addition it is estimated that c.15-20% of permissions are re-engineered with a re-permission sought, which would have the effect of delaying completions, potentially for a significant period.

Clearly, the application of a significant buffer in the trajectory to compensate for this known issue would be commensurate with these DCLG findings.

5.6.3 The Council's contingency of 1007 dwellings (6.2% of 16,120 / 6.4% of 15,675) is below the recommendations of DCLG and is therefore unlikely to provide sufficient flexibility for unforeseen circumstances. A 10% contingency would be circa 1,500 – 1,600 dwellings and require a trajectory of 14,245 dwellings rather than 13,974 (assuming the OAN is as proposed by ABC).

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?

5.7.1 No comment

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 dwellings 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?

5.8.1 We do not believe the approach to windfalls is justified. Para 48 of the NPPF is clear that LPA's may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.

5.8.2 Whilst the rate of windfall delivery at 100dpa from 2022/23 onwards would not appear unreasonable based on past trends, no evidence has been produced to show how many of the dwellings delivered over the last ten years have been on garden land and as such would now not be expected to come forward given para 48 of the NPPF.

5.8.3 As set out in Lichfields accompanying report, in past trends data ABC seem to have classified a windfall site as any site which was unplanned for, regardless of size. This is evidenced through the inclusion in the housing trajectory of extant windfalls permissions both not started and under construction of 10 dwellings or above, amounting to some 307 dwellings. If the long term average windfalls completions analysis undertaken by the Council includes large windfall sites, this is likely to introduce an element of double counting in the trajectory because the Local Plan also allocates sites of 10 dwellings or more for housing (which to date would have been classified as windfalls). The Council should undertake the appropriate analysis of this data to exclude garden land and large site for a realistic past trend, alongside the relevant policies in the local plan to ensure its evidence is sufficiently robust and reliable.

5.8.4 The assumption that there will be 150 windfall dwellings in 2021 and 100 from 2022-2030 appears to be unjustified. The HTP has applied a 25% reduction to extant windfalls which have not commenced development and a 44% reduction to the evidenced windfall allowance over the past 12 years (100/177 dpa) to ensure a

conservative windfalls estimate. However there is no such explanation for the 150 dpa windfalls figure in 2021.

- 5.8.5 The 25% non-delivery rate applied to extant windfalls which have not commenced development is reasonable on the basis of past evidence. The HTP compares the amount of homes granted on windfall applications over the past 5 years with the amount of homes actually delivered on windfall sites, which amounts to a non-delivery rate of 23%. The Council has rounded this figure to 25% for application in the windfall calculation. Although it is accepted that there is evidence to apply a non-delivery rate to the extant windfalls figure, it is not clear why the Council has not applied this to all permissions in its housing trajectory.

0ix) 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?

5.9.1 No comment

x) How would the supply of housing sites be monitored and managed?

5.10.1 No comment

Conclusion

Having regard to our reps on issues 4 and 5 we believe that the housing requirement is not justified – it should be at least 17,290 (910dpa) over the plan period 2011-2030, not 16,120 (848dpa); and we do not believe ABLP will meet the housing requirement over the plan period, or provide a 5 year supply of deliverable housing sites with an appropriate buffer. Please see appendices 5.1 and 5.2.

The only way both matters can be rectified is by allocating additional land for housing. Some of that land should be in Tenterden so as to ensure it can maintain its vitality and its role as the second town in the borough serving the needs of the southern and western parts of the borough.

In any case, there is a fundamental need for clarity from ABC on what housing requirement they are applying, in what manner and for what time period. Our appendices provide one set of calculations (based on 848dpa) but the Council also present figures of 825dpa, 859dpa and 966dpa for differing periods. Those are matters which will need to be addressed and simplified for the Plan, but which do not affect our overall conclusion; that there is insufficient housing supply.

JAA Appendix 5.1 – ABC 5 Year HLS Housing Assessment 2017/18 – 2022/23

Requirement	ABC Liverpool	JAA Sedgefield Accepting ABC figures on supply	JAA Sedgefield JAA figures on supply	JAA requirement + JAA figures on supply & Sedgefield
District Plan housing requirement 2011 – 2030	16,120 848.4dpa	16,102 848.4dpa	16,102 848.4dpa	17,290 (910 dpa)
Completions since 2011	3,177	3,177	3,177	3,177
5 year housing requirement 2017/18 – 2022/23	5972.40 ⁵ (1,194dpa)	7,381.2 ⁶ (1,476dpa)	7,381.2 (1,476dpa)	8,199 ⁷ (1640dpa)
Supply				
Town centre sites	511		511	
Chilmington Green	600		600	
Existing urban allocations under construction	1,071		1,071	
Existing urban allocations not started	789		710 10% discount	
New urban site allocations	1,140		1,026 10% discount	
A20 corridor new allocations	200		200	
Existing rural allocations under construction	279		279	
Existing rural allocations not started	288		218 Tent1B pushed back	
New rural site allocations	855		770 10% discount	
Neighbourhood plan sites	157		157	
Windfalls	799		649 150 deleted	
Total Housing Supply in year 1 - 5	6,689	6,689	6,191	6,155
Five year supply	5.6	4.5	4.19	3.75
Total supply / Total requirement x 5				
Deficit over the 5 year period	+717	-692	-1,190	-2,044

⁵ Based on the plan requirement to achieve 848dpa (x5) = 4,242
 +735 to address shortfall from the first 6 years of the plan - accommodated across the rest of the plan period
 (1911/13 x 5) + 20% buffer (995)

⁶ Based on the plan requirement to achieve 848dpa (x5) = 4,242
 +1,911 shortfall from the first 6 years of the plan accommodated in the first 5 years + 20% buffer (1,230)

⁷ Based on the plan requirement to achieve 910dpa (x5) = 4,550
 +2,283 shortfall from the first 6 years of the plan (910 x 6 = 5460 – 3177 = 2283), accommodated in the first 5
 years + 20% buffer (1,366)

JAA Appendix 5.2 – Comparison of housing requirement, supply and residual requirement

	ABC	JAA
Baseline DCLG 2014 population and household projections	14,934 (786 dpa)	14,934 (786 dpa)
Vacancies	incl. in dpa above	incl. in dpa above
Demographic led needs London migration		798 (42 dpa) Bringing baseline to 15,732 (828 dpa)
Market signals	5% 15,675 (825 dpa)	10% 17,290 (910 dpa)
DTC	-	-
OAHN 2011-2030	15,675 (825 dpa)	17,290 (910 dpa)
Future Proofing	442 (23dpa)	-
Requirement	16,120 (848 dpa)	17,290 (910 dpa)
Completions since 2011	3,177	3,177
Total commitments	13,974	12,685 max ⁸
Total Supply	17,151	15,862 Max
Shortfall	+1,031	-1,428

⁸ Delete 150 – windfalls year 2021/22
 Gasworks Lane (Policy TC14/S10) (159 dwellings), and the Former Klondyke and Newtown
 Works Phase 2 (Policies S6 and S7): (350 dwellings)
 Reduce Chilmington Green from 2500 to 2170
 Reduce Land NE of Willesborough Road from 700 to 620
 Reduce and Court Lodge Kingsnorth from 950 to 730

JAA Appendix 5.3 – ABC 5 Year HLS Housing Assessment 2018/19 – 2023/24

Requirement	ABC Liverpool	JAA Sedgefield Accepting ABC figures on supply	JAA Sedgefield JAA figures on supply	JAA requirement + JAA figures on supply & Sedgefield
District Plan housing requirement 2011 – 2030	16,120 848.4dpa	16,102 848.4dpa	16,102 848.4dpa	17,290 (910 dpa)
Completions since 2011	3,816	3,816	3,816	3,816
5 year housing requirement 2017/18 – 2022/23	6,150 ⁹ (1,230dpa)	7,634 ¹⁰ (1,527dpa)	7,634 (1,527dpa)	8,525 ¹¹ (1,705dpa)
Supply				
Town centre sites	879		879	
Chilmington Green	800		600	
Existing urban allocations under construction	861		861	
Existing urban allocations not started	974		876 10% discount	
New urban site allocations	1,625		1,463 10% discount	
A20 corridor new allocations	250		250	
Existing rural allocations under construction	170		170	
Existing rural allocations not started	348		198 Tent1B pushed back	
New rural site allocations	855		770 10% discount	
Neighbourhood plan sites	157		157	
Windfalls	699		449 250 deleted	
Total Housing Supply in year 1 - 5	7,618	7,618	6,673	6,673
Five year supply	6.2	4.98	4.37	3.91
Total supply / Total requirement x 5				
Deficit over the 5 year period	+539	-16	-961	-1,852

⁹ Based on the plan requirement to achieve 848dpa (x5) = 4,242
 +883 - shortfall from the first 7 years of the plan – accommodated across the rest of the plan period
 (2120/12x5)
 + 20% buffer (1,025)

¹⁰ Based on the plan requirement to achieve 848dpa (x5) = 4,242
 +2120 shortfall from the first 7 years of the plan accommodated in the first 5 years
 + 20% buffer (1,272)

¹¹ Based on the plan requirement to achieve 910dpa (x5) = 4,550
 +2,554 shortfall from the first 7 years of the plan (910 x 7 = 6370 – 3816 = 2554), accommodated in the first 5
 years
 + 20% buffer (1,420)