

Housing Trajectory – Amended Housing Requirement Pre-adoption

1. The SADC housing trajectory in the Regulation 19 'Publication' Local Plan includes a stepped requirement for the two pre-adoption years (2024-25 and 2025-26) which was set in order that the estimated completions / total land supply for that period covered the requirement. When drafted this was set at 389pa in order that the estimated completions / total land supply for that period of 797 units met the requirement, plus a small 'headroom' of 19 units.
2. It is now recommended to amend the approach so as to allow for more 'headroom' in the pre-adoption housing requirement (to 300pa), whilst ensuring that the overall trajectory meets the Standard Method in full. Therefore, the overall Local Plan period requirement would remain the same, but the pre-adoption requirement would be reduced to a relatively modest degree.
3. This change is proposed in order to give confidence to all parties, including the Inspectors, that the Plan at the point of adoption will be able to meet both of the criteria set out in the NPPF by which to ascertain whether *'the policies which are most important for determining the application are out-of-date'* (from NPPF 2023 paragraph 11d). These are set out at NPPF 2023 footnote 8 as follows:

This includes, for applications involving the provision of housing, situations where: (a) the local planning authority cannot demonstrate a five year supply (or a four year supply, if applicable, as set out in paragraph 226) of deliverable housing sites (with a buffer, if applicable, as set out in paragraph 77) and does not benefit from the provisions of paragraph 76; or (b) where the Housing Delivery Test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years.

N.B. although the wording used differs in the NPPF 2024, these tests and measurement criteria essentially have the same effect.

4. The proposed change to the pre-adoption housing requirement would have the effect of providing assurance of meeting the measurement at (b), ie *'where the Housing Delivery Test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years.'* The 300pa requirement for the two pre-adoption years in the Local Plan period would enable this 75% Housing Delivery Test (HDT) requirement to be met with a small 'headroom' (the expected result would be circa 76%, dependent on actual delivery in 2025/26).
5. The previous three years HDT would be calculated as follows:
 - 2023/24: Requirement of 885 units; delivery of 438 units
 - 2024/25: Requirement of 300 units; delivery of 381 units
 - 2025/26: Requirement of 300 units; expected delivery of 312 units
 - Total 3 years 2023-2026: Requirement of 1,485 units; expected delivery of 1,131 units
 - Delivery of housing (1,131) as a % of the housing requirement (1,485) over the previous three years: 76%

6. The HDT measurement rule book¹ discusses situations where there are changes to the housing requirement as follows:

Changes to the housing requirement

16. Any new housing requirement will be used for the calculation of the Housing Delivery Test from the date that it becomes part of the development plan.

17. For the purposes of calculating the Housing Delivery Test, the new adopted housing requirement will apply from the start of the relevant plan period (set out in the strategic policies for housing), which may be earlier than the adoption of the strategic policies.

18. Following adoption of new strategic policies, the new housing requirement figure can be used to recalculate the Housing Delivery Test results during the year, in collaboration with MHCLG.

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7. The subsequent Table 1 '*Housing figure for the Housing Delivery Test, depending on type and age of the strategic housing policies in a plan-making authority*' clarifies that for an adopted housing requirement that is less than 5 years old the stepped housing requirement applies. A note to the table also states: "*Note: whichever is lower, of either the minimum annual local housing need figure or the housing requirement identified in this table, will be used.*"
8. With regards to paragraphs 16 and 17 above, it is understood that the new housing requirement will be used for the calculation of the HDT from the date that it becomes part of the development plan, and that this includes the 'pre-adoption' part of the 17-year Local Plan period.
9. With regards to paragraph 18 above, SADC is in regular contact with MHCLG and intends to engage with MHCLG in due course to confirm their agreement that the HDT results for the 3 years before expected adoption in April 2026 would meet the relevant 75% HDT test.
10. In summary, taking the above into account, it is considered that the relatively modest reduction to the stepped housing requirement for the two pre-adoption years is justified and would give confidence to all parties, including the Inspectors, that the Plan at the point of adoption will be able to meet both of the criteria set out in the NPPF by which to ascertain whether '*the policies which are most important for determining the application are out-of-date*' (from NPPF 2023 paragraph 11d).

¹ [Housing Delivery Test measurement rule book - Updated 12 December 2024](#)