

PSB 2 – Milwood Further Response to Council Response (P2-N5) to Advisory Notes 1 & 2 (P2-N2)

Milwood Advisory Notes 1 & 2 = Examination Library Ref P2-N2

Council Response to Advisory Notes 1 & 2 = Examination Library Ref P2-N5

Council Response to Advisory Note 1

Council Para 1

In response to The Council, in my view, the 2016/17 dates in the first sentence are correct as set out in Advisory Note 1.

With respect to The Council, the text is self explanatory, stating that since the requirement calculation within the 2014 5YS Statement – stating that as at 31st March 2014, the Annual Requirement (*for the following year 1st April 2014 to 31st March 2015*) was 672 units (*following the calculation of the Shortfall since the start of the Plan period (3 years at that date), and application of a 20% buffer for persistent under delivery as per p47 of the Framework*), and that, **since** that date, the annualised requirement has been incorrectly calculated, resulting in the **current** 31st March 2016 calculation, for the year 2016/17, being inaccurate.

(my emphasis)

The current 2016 5YS Statement sets the annual requirement for the following year, being of course 1st April 2016 to 31st March 2017, hence the reference to the same.

Council Para 2

In response to The Council, in my view, the second Table is correct as set out in Advisory Note 1.

The annualised requirement of 672 units was set within the 2014 5YS Statement (page 2), following calculation of the shortfall since the start of the Plan period to 31st March 2014, and application of the 20% buffer as per the requirement in p47 of the Framework, given the persistent under delivery to date.

Therefore, when you reach the end of the following qualifying year, 1st April 2014 to 31st March 2015, and seek to then accurately calculate the shortfall, to insert into the calculations for the annualised requirement for the following year, being 2015/16, there are two questions to enable this calculation;

1. How many units were actually completed during 2014/15 (1st April 2014 to 31st March 2015)?
2. What was the actual annualised requirement for this qualifying year, as set by the previous 2014 5YS Statement calculations?

(as i have done in my second Table)

The Council, in their 2015 5YS Statement (P2 – E17), when calculating their shortfall, has incorrectly, in my view, reset / re-based the requirement sum at 500 units, and then proceeded to use the resultant figure to calculate the new annualised requirement.

(this same method has been used by The Council in the following 2016 5YS Statement (P2 – L1)).

The annualised requirement of 672 units was set the preceding year, taking into account both the calculated shortfall since the start of the Plan period, and also the application of a 20% buffer, as required by p47 of the Framework, therefore being fixed in accordance with Government Policy.

To have a specifically calculated and fixed requirement sum at the start of the 1st April 2014 to 31st March 2015 qualifying year (672), and then to remove it and substitute it at the end of the qualifying year, when calculating the shortfall, (*to enable calculation of the specific actual requirement for the following 1st April 2015 to 31st March 2016 qualifying year*), with the annualised Plan target (500) is, in my view, and with respect, a flawed approach.

Using The Council methodology, at the end of 1st April 2014 to 31st March 2015 qualifying year, the increased 172 unit annualised requirement, over and above the annualised Plan target, simply disappears, which, in my view is incorrect and defeats the actual object and purpose of the application of a buffer.

Council Para 3

In response to The Council;

When calculating the actual annualised requirement (Tables 3 & 4 and 6 & 7 of Advisory Note 1), i have used the Plan target sum of 500 units pa.

However, when calculating the actual Shortfall, i have used the actual annualised annual requirement.

To do otherwise, and use the Plan target sum, as The Council suggest, would not result in an accurate Shortfall sum being reached.

The Council suggest that the PSB Plan target sum should be used, as i have displayed in my Table 1. My Table 1 is taken directly from The Councils own 2014 and 2015 5YS Statements, and displays completions data from the start of the PSB Plan period 2011 to 2014.

There is a reason why the years 2011 to 2014 display a consistent, year on year 500 units pa Requirement, and not an accurately calculated and differing sum total for each qualifying year; The 2014 5YS Statement was the first, using the new PSB Plan target, with the previous 2013 5YS Statement, and those before it, using that of the former RSS Phase 11 Revision and RSS, and therefore could not be carried over into the 2014 PSB compliant Statement.

Therefore, the 2014 5YS Statement was the first opportunity for the actual shortfall and subsequent requirement calculations to be undertaken accurately against the PSB annual target.

Before the 2014 5YS Statement and adoption of the PSB, years 2011/12 to 2013/14 were physically assessed under the previous RSS annual target of 550 units pa, and, following adoption, recorded as part of the PSB Plan period, with the target changing to that of the PSB.

So, whilst years 2011 to 2014 are recorded as part of the PSB Plan period, the 'actual' calculated requirement was not produced for each year on year from 2011 using the baseline annual target sum of 500 units until the 2014 5YS Statement.

Council Para 4

Using the accurately calculated annual requirement of 672 units pa, as at 31st March 2014, as the requirement for year 2014/15 does not 'double count' the shortfall from years 2011 to 2014, and i fail to see how The Council reach such a conclusion.

It is simply an accurate calculation of the annualised requirement as at 31st March 2014, using the accurate information provided since the 2011 start of the Plan period, and calculated in accordance with the requirement of the Framework.

Further, and in any event, it is The Council who have calculated this very figure, within their 2014 5YS Statement, and it is they who state, following calculation, that their Annualised Housing Requirement from 1st April 2014 is 672 units pa.

The remainder of Council Response to Advisory Note 1

I respectfully submit that the corresponding information within Advisory Note 1 is correct, and that The Council information is incorrect.

It follows, that on the basis of the starting point of the stated annual requirement of 672 units pa as at 31st March 2014, and then the accurate application of the same in subsequent calculations in both 2015 and 2016 5YS Statements, as displayed in Advisory Note 1, that information is correct.

Council Response to Advisory Note 2

I respectfully submit that the corresponding information within Advisory Note 2 is correct, and that The Council information is incorrect.

It follows, that on the basis of the starting point of the stated annual requirement of 672 units pa as at 31st March 2014, and then the accurate application of the same in subsequent calculations in both 2015 and 2016 5YS Statements, as displayed in Advisory Note 1, that information is correct.

Therefore, by applying the most recent and accurate requirement calculation of 31st March 2016 to the supply calculation, in an accurate manner, results in the figures as displayed in Advisory Note 2.