

# Five Year Housing Land Supply Statement

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**Exeter City Council**  
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## **1. Introduction**

- 1.1 This statement presents the current five year housing land supply position for Exeter City Council. It applies from 1 April 2022 and sets out the housing supply position in accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). It covers the five year period from 1 April 2022 to 31 March 2027.

## **2. Establishing the five year land requirement**

- 2.1 The NPPF<sup>1</sup> states that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old (unless these strategic policies have been reviewed and have not been found in need of updating). Footnote 37 of the NPPF expands upon this, stating that where local housing need is to be used as the basis for assessing the five year supply, it should be calculated using the Government's standard method set out in PPG.

### **Local housing need**

- 2.2 The Exeter Core Strategy was adopted in February 2012 and is therefore more than five years old. It has not been reviewed and the Council is instead embarking upon the preparation of a new Exeter Local Plan (the Exeter Plan). Consequently, this position statement measures the five year land supply against local housing need calculated using the standard method. Based on the standard method, Exeter's current annual local housing need figure is 650<sup>2</sup>. This generates a basic five year housing requirement of 3,250.

### **Addressing any past housing delivery shortfalls**

- 2.3 For the purposes of calculating the five year housing requirement, the PPG<sup>3</sup> states that:

*Where the standard method for assessing local housing need is used as the starting point in forming the planned requirement for housing, Step 2 of the standard method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figure.*

- 2.4 Since Exeter's five year housing requirement is based on the standard method, there is no requirement to specifically address any past under delivery of housing separately when establishing the minimum annual local housing need figure / the five year housing requirement.

### **Adding a buffer**

- 2.5 To ensure that there is a realistic prospect of achieving the planned level of housing supply, PPG<sup>4</sup> advises that a local planning authority should always add an appropriate buffer to the housing requirement in the first five years, bringing forward additional sites from later in the plan period. This will result in a five year requirement over and above the level indicated by the local housing need figure. The PPG states that one of the following buffers should be added, depending upon circumstances:

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<sup>1</sup> Paragraph 68

<sup>2</sup> Calculated using the ONS 2014-based household projections for Exeter for the period 2021 to 2031, adjusted to take into account the ONS 2021 median workplace-based affordability ratio for Exeter.

<sup>3</sup> Paragraph: 031 Reference ID: 68-031-20190722

<sup>4</sup> Paragraph: 022 Reference ID: 68-022-20190722

- 5% - the minimum buffer for all authorities, necessary to ensure choice and competition in the market, where they are not seeking to demonstrate a 5 year housing land supply;
- 10% - the buffer for authorities seeking to 'confirm' 5 year housing land supply for a year, through a recently adopted plan or subsequent annual position statement (as set out in [paragraph 74 of the National Planning Policy Framework](#)), unless they have to apply a 20% buffer (as below); and
- 20% - the buffer for authorities where delivery of housing taken as a whole over the previous 3 years, has fallen below 85% of the requirement, as set out in the last published Housing Delivery Test results.

2.6 The Council is not seeking to 'confirm' its five year housing supply for a year as set out in paragraph 74 of the NPPF and therefore a buffer of 10% is not applicable. The Council passed the 2021 Housing Delivery Test with a result of 155%, meaning that a buffer of 20% is not applicable. Based on advice in the PPG, it is instead appropriate to calculate Exeter's five year housing requirement by applying a buffer of 5% to the local housing need figure.

### **The final five year land requirement**

2.7 Taking into account the steps set out in paragraphs 2.2 to 2.6 above, Exeter has a five year housing requirement of 3,413 homes. The calculation is set out in table 1.

Table 1: Exeter's five year land requirement 2022/23 – 2026/27

<b>Description</b>	<b>Homes</b>
(A) Annual local housing need (at 1 April 2022)	650
(B) Basic five year housing requirement (A x 5)	3,250
(C) Shortfall	N/A
(D) 5% buffer	163
(E) Total five year housing requirement	3,413

### 3. National policy and guidance – identifying a five year land supply

- 3.1 The NPPF contains the following definition of ‘deliverable’ which applies to sites that can be identified in the five year housing supply:

***Deliverable:*** *To be considered deliverable, sites for housing 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. In particular:*

*a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*

*b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

- 3.2 The Council interprets this definition to mean that small sites (below ten homes) with either outline or full/reserved matters permission, and major sites (ten homes or more) with full/reserved matters permission, are to be considered deliverable **unless there is clear evidence to demonstrate that they are not**. Sites with outline permission for ten or more homes and sites that are allocated in a development plan, or have a grant of permission in principle, or are identified on Exeter’s brownfield register, should only be considered deliverable **if there is clear evidence of a realistic prospect that housing completions will begin on site within five years**.

- 3.3 The PPG<sup>5</sup> provides additional guidance on the types of evidence required to demonstrate that sites with outline permission for ten or more homes, sites that are allocated in a development plan, sites with a grant of permission in principle, or sites identified on brownfield registers can be considered deliverable within the five year housing supply. It states that such evidence may include:

- *Current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
- *Firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;*
- *Firm progress with site assessment work; or*
- *Clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.*

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<sup>5</sup> Paragraph: 007 Reference ID: 68-007-20190722

3.4 This five year housing supply statement has been produced in line with the NPPF's definition of deliverability and the guidance set out in PPG. During July 2022, the Council contacted the developers / promoters of all major sites with planning consent (or with a resolution to approve consent subject to the completion of a S106 Agreement) to establish:

- Advice on delivery rates for sites;
- Progress towards submission of applications where applicable;
- Whether there is 'clear evidence' of non-delivery or delivery of consents and allocations, in line with the requirements of the definition of deliverability; and
- Whether or not there is a developer on board.

3.5 Contact was also made with the developers / promoters of all major sites with planning consent (or with resolution to approve consent subject to the completion of a S106 Agreement) April 2022 and in September 2021.

3.6 Appendix 1 provides a trajectory for all sites with planning consent (or with a resolution to approve planning consent subject to the completion of a S106 Agreement) at 1 April 2022. For each site, the trajectory takes into account the following sources of information:

- In the first instance, the response of the developer / promoter provided in July 2022;
- If no response was provided in July 2022:
  - The response of the developer / promoter received in April 2022 or September 2021, if one was received; or
  - The market conditions model in appendix 2 of the Exeter HMA HELAA Methodology (see paragraph 3.13 below for further details)<sup>6</sup>. The model has been developed with the HELAA Panel, comprising a group of representatives from the housebuilding industry; or
  - For small sites with outline or full/reserved matters consent and major sites with full/reserved matters consent, any clear evidence to demonstrate that the site is not deliverable;
  - For major sites with outline consent, any other clear evidence of a realistic prospect that housing completions will begin on site within five years.

3.7 The consequence of this robust approach is that a number of sites with planning consent (or resolution to approve planning consent subject to the completion of a S106 Agreement) at 1 April 2022 are either not included, or not fully included, in the trajectory for the forthcoming five years, i.e.:

- **Land at Pinhoe Quarry, Harrington Lane; Seabrook Orchards (formerly land to north of Topsham Town AFC Ground) (Phase 2); and Aldens Farm East, Land between Chudleigh and Dawlish Roads:** these three sites have full or reserved matters consent, but the developers / promoters have advised that whilst the delivery of homes will commence in year 1-5, full completion will not

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<sup>6</sup> Exeter HMA HELAA Methodology, Revised April 2017. East Devon District Council, Exeter City Council, Teignbridge District Council, Mid Devon District Council and Dartmoor National Park Authority. See [Evidence - Greater Exeter Strategic Plan \(gesp.org.uk\)](https://www.gesp.org.uk), HELAA-Appendix A-Methodology.

occur until years 6+. This means that 219 homes with full or reserved matters consent are not included in the five year housing supply;

- **Exeter Royal Academy for Deaf Education, Topsham Road:** This site has full consent for the development of 146 homes, a care home and 61 assisted living units. Each of the three elements will be delivered by a different developer. The 146 homes and care home are included in the five year supply. However, the Council has taken the precautionary approach of excluding the assisted living units from the five year supply. This is because the prospective developer for that part of the scheme wishes to replace the assisted living units with 84 retirement homes. A full planning application for this proposal is currently at appeal. The Council has therefore not included in the five year supply the 61 assisted living units with consent;
- **Hill Barton Farm, Hill Barton Road (phase 4) and The Old Coal Yard, Exmouth Junction, Mount Pleasant Road (phase 3):** Hill Barton Farm has reserved matters consent, whilst Phase 3 of the Old Coal Yard benefits from a recent resolution to approve full consent for 89 homes subject to the signing of a Section 106 Agreement. The promoter of the former site, and the developer of the latter site, have not responded to the Council's recent requests for predicted build rates and therefore the HELAA market conditions model has been applied. This results in an assumed build rate that would see 113 homes completed in years 6+ at Hill Barton Farm (of the 200 homes with reserved matters consented) and 87 homes completed in years 6+ at Phase 3 of The Old Coal Yard (of the 89 that benefit from a resolution to approve full consent);
- **162-163 Fore Street; 130 Fore Street; 7-11 North Street; Emmanuel School, Blackboy Road; and 90 South Street;** these five sites have full consent, but the developers / promoters have advised that whilst the consents have been implemented, no homes will be delivered in years 1-5. This means that a further 32 homes with full consent are not included in the five year housing supply;
- **Hurst Alms-houses, 2-24 Fairpark Road:** this site benefits from a resolution to approve full consent subject to the completion of a S106 Agreement to demolish 12 existing alms-houses and redevelop the site to provide 31 new alms-houses (resulting in a net gain of 19 units). Delivery will be subject to significant pre-commencement archaeological work with potential viability implications and therefore the Council considers that completions may not take place in years 1-5;
- **St Andrews Yard, Willeys Avenue:** this site has full consent to be redeveloped to provide 9 apartments. However, planning consent has also been granted to build a storage container on the site. The Council understands that it is the latter consent that will be implemented and therefore the 9 apartments are not included in the five year housing supply.
- **Seabrook Orchards (formerly land to north of Topsham Road); and Aldens Farm West:** these sites have outline consent. They are not included in the five year housing supply because the Council considers that there is currently no clear evidence to support their inclusion, albeit that parts of Seabrook Orchards have or are currently being delivered following the granting of reserved matters



consents and a developer is understood to be on board at Aldens Farm. This means that 328 homes with outline consent are not included in the five year housing supply; and

- **Land east of Exeter Branchline, Newcourt, Old Rydon Lane; and Land to the west of the Met Office, Hill Barton (phase 5):** these two sites have a resolution to approve outline consent subject to the completion of a S106 Agreement. They are not included in the five year housing supply because the Council considers that there is currently no clear evidence to support their inclusion.

3.8 The robust approach taken by the Council to obtain evidence also means that four sites with outline consent are included in the five year supply, either in full or in part, on grounds that there is clear evidence of a realistic prospect that housing completions will begin on site within five years:

- **Land east of Cumberland Way:** outline consent was granted in 2021 for up to 80 homes. The site has recently been sold to Sovereign Housing Association. Sovereign has engaged with pre-application discussions with the Council and advised in July 2022 that it expects to submit a reserved matters application in September/October 2022. A deed of variation has been agreed that allows for the provision of 68 affordable homes on the site and this is the number of units included in the five year supply. Sovereign expects the first homes to be delivered in 2023/24 or 2024/25 and has confirmed that the pace of delivery will be high due to target dates set by Homes England. The Council considers that this information, and the fact that is a greenfield site located within an area of the City where other large greenfield schemes have recently successfully been delivered, provides clear evidence of a realistic prospect of housing completions within five years;
- **Bricknells Bungalow, Old Rydon Lane:** outline consent is in place for 63 dwellings. Phase 1, comprising 6 homes, was completed in 2021/22. A reserved matters application for the remaining 57 homes is pending consideration. Whilst no response has been received from the site's agent, the Council considers that the reserved matters application and the successful delivery of phase 1 provide clear evidence of a realistic prospect of housing completions within five years. The five year supply calculation conservatively assumes that completions will begin in 2024/25 and applies the HELAA methodology market conditions lapse rate thereafter;
- **The Old Coal Yard, Exmouth Junction, Mount Pleasant Road (Phase 2):** outline consent for a scheme of 400 homes and 65 assisted living homes was granted in May 2021, with landscaping being the only matter left to be determined at reserved matters stage. The scheme will comprise three phases, with a different developer delivering each phase. A reserved matters application for the approval of landscaping matters for phase 2 was submitted to the Council in May 2022 by the developer Ilke Homes. Ilke Homes has provided a high estimated build rate as it will be using modern methods of construction (modular build) to deliver the scheme. One application to discharge conditions on the outline has been consented and a further two discharge of conditions applications are pending consideration. The Council considers that the information provided by Ilke Homes, the progress made towards discharging conditions on the outline and

the submission of a reserved matters application provide clear evidence of a realistic prospect of housing completions within five years; and

- **Land at Redhills, Exwick Lane:** outline consent for up to 80 homes was granted at appeal in February 2022. The appellant's agent has not responded to the Council's requests for delivery advice. However, the appellant's Statement of Case states that the site could be delivered quickly and will contribute towards the five year land supply. The Council considers this statement to represent clear evidence of a realistic prospect of housing completions within five years. The build rate in the HELAA Methodology has been applied, meaning that 62 homes are included in the five year land supply.

3.9 It should be remembered that a five year housing supply is not a test of housing delivery certainty, but rather a test of there being a realistic prospect of housing delivery. This is evident by the wording of the PPG and the inclusion of a buffer in the five year housing requirement, which reflects the possibility that not all homes included in the five year housing supply are certain to come forward in the manner assessed. The Council considers that its approach to determining deliverability is robust and reflects the aforementioned guidance in PPG.

3.10 This statement has been produced in line with guidance in the PPG<sup>7</sup> and the Housing Delivery Test Rulebook<sup>8</sup> on how to count housing completions, as follows:

- Completions are net figures, offsetting any demolitions;
- With the exception of purpose built student accommodation (see section six of this statement) every self-contained dwelling is counted as one home;
- Empty homes are only counted where they are not already counted as part of the existing stock;
- Communal accommodation (Use Class C2) is counted using a ratio of 1 home to 1.8 bed spaces.

3.11 A High Court Judgment means that Exeter City Council is currently unable to count purpose built student accommodation in the five year supply. Further details are provided in section six of this statement.

### **The impact of COVID-19 on deliverability**

3.12 Exeter's housing completions for 2021/22 amounted to 585 dwellings (excluding purpose built student accommodation). Whilst lower than the current annual housing requirement of 650 homes, this is an increase from the preceding year (348) and indicates a recovery from the impact on the construction industry of the three COVID-19 National Lockdowns during 2020/21. A small number of developers / promoters of major sites have advised that delivery has also been impacted by the UK's departure from the European Union and the war in Ukraine.

3.13 At this stage, it is reasonable to assume that developers have taken the impact of the pandemic, the UK's departure from the European Union and the war in Ukraine into account when advising the Council on commencement dates and build rates for

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<sup>7</sup> PPG Paragraphs: 029 Reference ID: 68-029-20190722; 030 Reference ID: 68-030-20190722 and 035 Reference ID: 68-035-20190722.

<sup>8</sup> Paragraph 11.

individual sites. Therefore, for major sites where developer advice has been obtained and all small sites, no further adjustments have been made to commencement dates and build rates. Where the Council has not received feedback from the developer, or where there is no convincing evidence to suggest an alternative build rate, the 'market conditions' build rate set out in appendix 2 of the Exeter HMA HELAA Methodology has been applied as a precautionary approach. The market conditions build rate assumes a suppressed build rate for the forthcoming five years, to reflect the conditions of a recession.

## 4. Five year housing supply position

- 4.1 The deliverable supply of housing identified in the next five years (2022/23 to 2026/27) is set out in detail in appendices 1 and 2. Table 2 summarises the data and identifies a total net supply of 3,275 homes. Definitions of the types of supply listed in the first column of table 1 are discussed in turn below.

Table 2: Total net housing supply 2022/23 to 2026/27

	22/23	23/24	24/25	25/26	26/27	Total five year supply (net)
Major sites with consent / resolution to approve	768	600	771	756	254	3,149
Small sites with consent / resolution to approve	36	90	0	0	0	126
Identified sites without planning consent	0	0	0	0	0	0
Windfalls	0	0	0	0	0	0
Total net supply	804	690	771	756	254	3,275

### Major and small sites with consent / resolution to approve consent

- 4.2 The deliverability of all major and small sites with consent or resolution to approve consent has been assessed as set out in section 3 above. For major sites, developer feedback on commencement and build rates (where provided) is given in the comments column of appendix 1.

### Identified sites without planning consent

- 4.3 Sites within this category include those that are allocated in the current development plan but do not yet have consent / resolution to approve consent, sites that have Permission in Principle and sites on Exeter's Brownfield Register. Of these sources:
- No unconsented site allocations are counted in the five year housing supply, because there is currently no clear evidence of a realistic prospect that housing completions will begin on these sites within five years;
  - No sites with Permission in Principle are counted in the five year housing supply, because there are currently no sites with this status in Exeter;

- Sites on Exeter's Brownfield Register are included in the five year housing supply if they have planning consent / resolution to approve planning consent (in which case they are counted as such and not as an 'identified site without planning consent'). Of the other nineteen sites on the Register, five have been developed since the Register was published, and there is currently no clear evidence of a realistic prospect that housing completions will begin on the remaining fourteen sites within the next five years.

- 4.4 Within this category, a further source of sites are those that are currently at pre-application or planning application stage. However, there is currently no clear evidence to justify the inclusion of these sites within the five year housing supply.
- 4.5 The Council has started to prepare a new Local Plan (the Exeter Plan). At this stage, there is no evidence to include in the five housing year supply any potential development sites that may be allocated in the Local Plan.

#### **Small sites windfall allowance**

- 4.6 The supply makes an allowance for windfall sites of less than twenty homes based on historic evidence. Appendix 2 provides the evidence for the windfall allowance, which has been calculated in accordance with the formula agreed with the HELAA Panel that is set out in appendix 4 of the HELAA Methodology. As can be seen from table 2, the result of applying the formula is that a contribution from windfalls is not included in the five year housing supply.

#### **The five year land supply position**

- 4.7 Table 3 sets out the years of supply against the five year land requirement at 1 April 2022.

Table 3: Exeter's five year land supply position at 1 April 2022

<b>Description</b>	<b>Homes</b>
(A) Five year housing requirement	3,413
(B) Deliverable supply	3,275
(C) Five year land supply position	4 years and 10 months

## **5. Conclusion**

- 5.1 Against the five year housing land requirement, the Council is currently able to identify a supply of four years and ten months for the period commencing 1 April 2022. The supply of deliverable homes falls short of the five year housing requirement by 138 homes.

## 6. Purpose Built Student Accommodation

- 6.1 In 2015, a High Court Judgment ruled that the Council was unable to count purpose built student accommodation (PBSA) in the five year land supply. This was because:
- the Judge ruled that the Council's housing requirement (which at the time was set by the Exeter Core Strategy) did not take full account of the need for student housing; and
  - the Judge ruled that, based on the wording of PPG at that time, it was only possible for local authorities to count PBSA towards meeting the housing requirement if there was evidence of market homes being released from student occupation.
- 6.2 As a consequence of this High Court Judgment, anticipated completions of PBSA are not included in the five year housing supply calculation set out in section four of this statement.
- 6.3 However, changed circumstances suggest that it may now be reasonable for the Council to count PBSA towards the five year housing supply.
- 6.4 The first change is the introduction by Government in 2018 of the Housing Delivery Test. Both the Housing Delivery Test and (in Exeter's case) the five year housing supply are measured against the standard method housing requirement. In the Housing Delivery Test, self-contained and communal PBSA are counted as part of the housing supply. The fact that the five year housing supply is measured against the same housing requirement as the Housing Delivery Test suggests that it may be reasonable, and indeed consistent with Government practice, for the Council to count self-contained and communal PBSA in Exeter's five year housing supply.
- 6.5 The second change comprises amendments to PPG made since the High Court Judgment<sup>9</sup>. The new PPG clearly sets out the process by which Councils can count PBSA in the five year housing supply:

*All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply based on:*

- *the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and / or*
- *the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation.*

*This will need to be applied to both communal establishments and to multi bedroom self-contained student flats. Several units of purpose-built student accommodation*

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<sup>9</sup> [Housing supply and delivery - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/housing-supply-and-delivery)

may be needed to replace a house which may have accommodated several students.

Authorities will need to base their calculations on the average number of students living in student only accommodation, using the published [census data](#), and take steps to avoid double-counting. The exception to this approach is studio flats designed for students, graduates or young professionals, which can be counted on a one for one basis. A studio flat is a one-room apartment with kitchen facilities and a separate bathroom that fully functions as an independent dwelling.

- 6.5 In addition to these changed circumstances, the Council is aware that a notable number of other local planning authorities with significant student populations count PBSA in the five year housing supply. The authorities include Birmingham City Council, Bristol City Council, Derby City Council, Leeds City Council, Charnwood Borough Council, Manchester City Council, Newcastle City Council, Oxford City Council, Plymouth City Council and York City Council. As with Exeter, at least three of these authorities (Bristol, Charnwood and Manchester) derive their five year housing requirements from the standard method because their adopted development plans are more than five years old. For reasons of consistency, this suggests that it may now be reasonable for the Council to count PBSA in the five year housing supply.

#### **The impact of including PBSA in the five year housing supply**

- 6.6 Given the points set out above, the Council considers it reasonable to assess the impact that the inclusion of PBSA would have on the five year housing supply. The assessment has been undertaken using the same robust approach set out in sections three and four of this statement. Deliverable schemes of PBSA have been added to the supply and the windfall allowance has been modified to take account of PBSA windfalls schemes of less than twenty units. PBSA has been counted in accordance with PPG, as set out in paragraph 6.4 above, i.e.:
- Each studio flat has been counted as one dwelling;
  - For cluster flats and communal PBSA, every 2.5 bedspaces has been counted as one dwelling based on published census data.
- 6.7 Table 4 summarises the outcome of the assessment, setting out the total net housing supply for the five year period including PBSA. A row is included in the table showing delivery on major schemes of PBSA with consent / resolution approve; and the windfall allowance takes PBSA into account. Full details of major sites of PBSA with consent / resolution to approve are provided in appendix 3 and full details of the adjusted windfall allowance are provided in appendix 2.

Table 4: Total net housing supply including PBSA 2022/23 to 2026/27

	<b>22/23</b>	<b>23/24</b>	<b>24/25</b>	<b>25/26</b>	<b>26/27</b>	<b>Total five year supply (net)</b>
Major sites with consent / resolution	768	600	771	756	254	3,149



	<b>22/23</b>	<b>23/24</b>	<b>24/25</b>	<b>25/26</b>	<b>26/27</b>	<b>Total five year supply (net)</b>
to approve						
Small sites with consent / resolution to approve	36	90	0	0	0	126
Sites for PBSA with consent / resolution to approve	145	66	490	0	0	701
Identified sites without planning consent	0	0	0	0	0	0
Windfalls (including PBSA)	0	0	0	0	0	0
Total net supply	949	756	1,261	756	254	3,976

6.8 Table 5 summarises Exeter's five year housing supply position if PBSA were to be included.

Table 5: Exeter's five year land supply position at 1 April 2022, including PBSA

<b>Description</b>	<b>Homes</b>
Five year housing requirement	3,413
Deliverable supply	3,976
Five year land supply position	5 years and 10 months

6.9 Table 5 shows that if PBSA were to be counted towards the five year housing requirement, the Council would currently be able to identify a supply of five years and nine months for the period commencing 1 April 2022. The supply of deliverable homes would exceed the five year housing requirement by 563 homes.