



Wyre Forest Local Plan Examination

Matter 2: Local housing need and the need for employment land

11 January 2021

Homes England (representor no. 1193261)

Question 2.1 Is the local housing need figure of 5,520 dwellings for the period 2016-2036 (276 dwellings per year (dpa)) a sound basis for the Plan? Particularly, is the figure adequately informed by:

a) the implications of the population and household projections in the past decade (including the 2018-based projections published in 2020) and alternative trend scenarios for population growth, household formation rates, net migration and economic factors;

- 1.1.1 The 5,520-dwelling requirement for the plan period 2016-2036 is based on the 2016-based household projections, as set out in the Wyre Forest District Housing Needs Study 2018. The 5,520 dwelling requirement includes the 4,460-dwelling housing need (223 dwellings per annum (dpa) plus an affordable uplift of 1,060 dwellings (53 dpa), a total of 276 dpa. In Table 6.0.2, the Local Plan allocates 15% more dwellings through allocations to allow for sites not delivering, to ensure a five year housing land supply and to future proof the plan.
- 1.1.2 The Council has used the 2016-based household projections rather than applying the Standard Method as these result in a slightly higher number than the 2014-based household projections which result in a figure of 248 dpa (4,960 over the plan period). This is justified on the basis of the need to deliver affordable housing and assisting the Government in achieving its national housing target.
- 1.1.3 Based on the latest 2018-based household projections, the housing need for the plan period would be 6,194 dwellings, rounded to 310 dpa. This figure does not include the affordable housing uplift. The Government's proposed new standard method would result in around 350 dpa.
- 1.1.4 Homes England supports the housing requirement proposed in the Local Plan, but suggests that the Plan emphasizes that this is a minimum requirement to provide the flexibility for numbers to be increased should there be opportunities to provide more housing in sustainable locations. A further review of housing requirements will be required as part of the five yearly review of the Local Plan, and this can be the opportunity to consider the 2018-based household projects and any further projections or evidence that may be available at the time of review.



b) affordability and the need for affordable housing; and

1.1.5 The housing figure includes an affordable housing adjustment of 1,060 dwellings (53 dpa) which is based on the 2016-based household projections and 2017 workplace-based affordability ratios. Homes England suggests that the affordable housing target should also be very clearly expressed as a minimum to provide the flexibility for numbers to be increased should there be opportunities to do so throughout the Plan period. A further review of affordable housing requirements will be required as part of the five yearly review of the Local Plan and this can be the opportunity to consider the 2019 and subsequent affordable ratios.

c) the Government's objective of significantly boosting the supply of homes?

1.1.6 As set out above for parts a) and b), it is suggested that the Council emphasises that its housing supply figures are minimum targets to provide opportunities to increase the number of new homes, including affordable homes over the Plan period.

1.1.7 The implementation of a 15% over-supply to ensure a 5-year supply of housing is maintained and allow flexibility in delivery, in the event that sites do not come forward as planned is supported and is considered to meet the Government's objective of significantly boosting the supply of housing. The allocation of larger sustainable sites, such as Lea Castle Village, to assist with delivery of housing and employment uses is supported. This approach accords with paragraph 72 of the NPPF that recognizes the important role that larger scale development can play in supporting a sustainable community with access to appropriate facilities. Larger sites need to be balanced with the supply of smaller sites in order to meet the District's needs. Homes England also seeks to bring forward smaller parcels that are suitable for SME developers as part of its approach to larger sites. Lea Castle Village is suited to this approach as it is made up of different parcels with separate accesses.

1.1.8 Homes England is the Government's housing accelerator tasked with using public land and working collaboratively with partners to deliver houses where they are most needed. Within this context, Homes England remains committed to the delivery of Lea Castle Wider Site to help address the housing challenges in Wyre Forest District. Homes England has a range of tools (including investment) which can assist in the delivery of schemes at pace, including multiple outlets and a range of housing products.

1.1.9 We can confirm that we will be preparing an outline planning application (with accompanying site specific infrastructure delivery strategy) for submission in the summer/autumn of 2021 (subject to the outcomes of this Examination). All necessary technical assessments and supporting documents will be prepared which will demonstrate a deliverable and policy compliant scheme when assessed against the emerging policies in the Local Plan.



Question 2.2 Is the Plan sound in identifying the figure of 29 hectares (ha) as the objectively assessed need for employment land over the Plan period? Does it remain sound, notwithstanding the changes to the Use Classes Order that came into effect in September 2020 that place commercial, business and service uses in the same Use Class?

- 1.1.10 The requirement to deliver 29ha of employment land is based on the 2018 Employment Land Review (ELR) and is considered appropriate for the plan period. The ELR suggests that *“around 86% should be identified for B1c/B2/B8 industrial/warehousing, and the remaining 14% for new office space”*, although this breakdown is not specified within the Local Plan, providing an element of flexibility subject to demand for different uses on different sites.
- 1.1.11 The provision for of 29ha employment land is considered to be sound, and the change in use class provides flexibility for a range of different employment uses to be delivered in accordance with current and future employment needs. It is anticipated that the Council may use conditions on planning permissions to ensure that certain types of employment uses are provided where there are specific needs.
- 1.1.12 It is considered appropriate for the employment policy to be flexible so that it can respond to changes in economic circumstances and allow for new and flexible working practices in accordance with the NPPF, paragraph 81d. This is considered to be particularly important in light of the uncertainty around the longer-term implications of COVID-19 and Brexit.