

Matter 7 – Dr Peter King

Q7.1 *Does the evidence clearly indicate that there is an adequate supply of deliverable and developable land to meet the Plan's housing requirement of 5,520 Class C3 dwellings and 487 Class C2 dwellings by 2036?*

Hagley Parish Council hopes that by the time this matter is reached, it will have been concluded that the target of 5520 is grossly excessive. The matter was dealt with at length under previous matters

Q7.1a *Have the potential sources of housing supply been assessed adequately, and is the estimated number of dwellings from these sources (including extant planning permissions, windfalls, prior approvals and site allocations) reasonable?*

The sources of supply considered are deficient:

- The supply from windfalls has been inadequately estimated.
- The repurposing of retail property in those parts of Kidderminster Town Centre designated as Secondary retail frontage has not been adequately considered.
- There is scope for increasing densities, particularly on urban sites in Kidderminster. Policy CP05 of the current plan provides for 70 dwellings per hectare (dph) in central Kidderminster and 50 dph in Stourport centre. Reductions from these high figures have not been justified.

Q7.1b *Are the estimates of site capacities for the site allocations and other identified sites justified, taking account of viability, infrastructure requirements and any delivery constraints?*

We would welcome higher target densities to ensure that less land is used. This will also aid in making the Eastern Extension and the expansion of Lea Castle Village beyond its brownfield core unnecessary or partly so.

Q7.1c *Is the approach to lapse rates on sites with planning permission and on site allocations justified?*

We are not aware that lapse rates are high. If they were, it would indicate a lack of demand, which would in turn imply that targets were too high.

Q7.1d *Is it justified to add a 5% buffer to the overall housing land supply requirement to make allowance for any under-delivery of housing from the sources of supply?*

1. We believe a 5% (rather than a 20%) buffer is justified. As far as we are aware, no restraint has been applied to housing land supply in the District. This means that delivery has been determined by demand. We know that the argument has been made that WFDC failed to meet its 5-year supply target, but that was because the current Plan provided an overambitious front-loaded housing trajectory, which the grant of planning consent failed to fulfil. This too is a reason why the target of 5,520 is more than the probable objectively assessed demand.
2. We note that the new plan again front-loads its housing trajectory, which again means that WFDC is setting the Plan up to fail.

Q7.1 e and f e) *would it be justified to take account of the contribution that may be made to the Class C3 supply by completion of Class C2 development over the Plan period?*

f) with reference to the 5-year housing land supply, should its adequacy be measured against the housing requirement (276dpa, plus the C2 requirement) or against the standard method figure that equates to 231dpa as proposed in document ED10?

1. The status of C2 housing (principally nursing and care homes) gives rise to difficulties, when developers seek to build developments of sheltered flats and claim that there is a shortage in the area, because the Plan has no target. Accordingly, a target is desirable. While an annual target would be inappropriate, its division into a target for each 5-year period would be appropriate to ensure even delivery throughout the Plan Period.
2. A local case of this arose in Hagley (APP/P18051A10S/1179394 25,27 & 29 Park Road, Hagley, Stourbridge) in 2004-5 at a time when there was a moratorium on new housing consents in Bromsgrove District. The applicant provided statistics based on a 5-mile radius around the site. When closely examined this turned out to be a shortage in the wider area, not nearest parts of Bromsgrove, where in fact the supply was a good one.

Q7.2 *(i) Overall, is the housing trajectory soundly based? (ii) Is there a reasonable prospect that the shortfall in delivery of the housing requirement from the start of the Plan period will be made up within 5 years of the Plan's adoption? (iii) Is there a reasonable prospect that a rolling 5-year supply of deliverable sites will be maintained from the date of the Plan's adoption?*

We do not believe that there is any real shortfall. Several of the urban sites from the existing (2006-26 Plan, adopted 2010) are carried forward to the present Plan. If there were a real shortfall, they would have been used. As stated under Q7.1d above, the existing plan was set up to fail from its start by front-loading the housing trajectory with houses for which there was not in fact a demand. The trajectory ought to be a flat one.

Appendix

Appeal decision concerning Park Road, Hagley