

Taylor Wimpey UK Ltd

ID: 536839



## **Matter 7: Housing Land Supply (paragraph 6.12 and the Plan as a whole)**



### **Pegasus Group**

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**7.1 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? In particular:**

**a) 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?**

7.1.1 Taylor Wimpey UK Ltd (TW) considers that, with the exception of the windfall rate identified within the Five Year Housing Land Supply Report **[ED10]**, all sources of supply have been assessed adequately, with the number of dwellings assumed from each source deemed reasonable. Clear evidence is set out within the Five Year Housing Land Supply Report **[ED10]** and the Engagement Strategy for Five Year Housing Land Supply **[EC12]**.

7.1.2 In respect of windfalls, the Five Year Housing Land Supply Report **[ED10]** provides an overview of windfall completions since 2008 and determines an average yield of 56 dwellings per annum from this source.

7.1.3 Paragraph 70 of NPPF states that:

*"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area."*

7.1.4 TW considers that historic completions will not necessarily reflect future delivery rates, as past windfall completions would have been influenced by a range of factors, including national policy, previous local policy and more recently, the robustness of the future housing supply i.e. whether a five-year housing supply could be demonstrated.

7.1.5 In addition, TW wish to raise concern that the windfall evidence provided does not distinguish between large and small site windfalls. There should be no reliance on large

site windfalls in the forward supply as these should be allocated through the Local Plan **[SD1 - Table 6.0.2]**. The recent change in national guidance to ensure at least 10% of homes being delivered on sites of less than 1ha should also reduce the opportunity and reliance on future windfall completions even further.

7.1.6 The supply identified within the Local Plan **[SD1 - Table 6.0.2]** makes no allowance for this source of supply: a position that is supported by TW, recognising that development to meet the housing requirement should be plan-led.

**b) 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?**

7.1.7 In respect of the Kidderminster Eastern Extension, the site capacity is considered justified. Site capacity has been determined through significant collaboration with WFDC and other relevant stakeholders, including consideration of viability, on-site infrastructure requirements and site constraints.

7.1.8 Parcels OC/6 and OC/13N would deliver approximately 1,400 dwellings alongside a 3ha community hub and significant new green infrastructure. The site would achieve the provision of 1,400 dwellings through the utilisation of a new density of 40 dph.

7.1.9 Further information is set out within a Development Vision Document prepared by TW.

7.1.10 Delivery timescales have been provided by TW which demonstrates all dwellings can be realistically delivered within the Plan period. This is set out within the Council's Engagement Statement for Five Year Housing Land Supply report. **[ED12a Page 29]**

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

7.1.11 The lapse rate applied to commitments not yet started is identified as 4%. In respect of the supply from this source, which equates to 484 dwellings, application of a 4% lapse rate only results in a reduction of 19 dwellings to 465 dwellings. This is not considered significant.

7.1.12 The Five Year Housing Land Supply Report **[ED10]** provides an overview of lapse permissions in Table 11. This identifies 11 lapsed permissions over an 18 year period, equating to an average of 4.35% of supply from unimplemented residential

permissions. In light of this evidence, it would seem prudent to apply a 5% lapse rate to unimplemented residential permissions, rather than the 4% applied within the submitted Local Plan.

7.1.13 Applying a 5% lapse rate to all sources of supply (not yet started) would have the result of reducing the total supply by 282 dwellings, from 6,365 to 6,083 dwellings.

7.1.14 This would leave a 10% buffer in the supply, over and above the housing requirement of 5,520 dwellings.

**d) 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?**

7.1.15 The Local Plan proposes a 15% buffer to the sources of supply to make an allowance for any under-delivery within the plan period. The justification is set out within the Housing Topic Paper **[ED3]**:

*"The clear and firm legal advice is that the Council should allocate around 15% more than required to build in some flexibility for non-delivery of sites. An over allocation of up to 20% was suggested by the Local Plans Expert Group which reported its findings to Government in March 2016. Wyre Forest District Council Members were keen to limit the amount of land taken out of the Green Belt; therefore the over-allocation was limited to 15%."*

7.1.16 The Local Plans Expert Group states in a Report to the Communities Secretary and to the Minister of Housing and Planning:

*"We recommend that the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF." (para. 11.4)*

7.1.17 It is noted that the proposed reserve sites identified in the Local Plan **[SD01 Policy 7B]** would provide an additional yield of 116 dwellings, not included within the

identified supply of 6,365 dwellings. Therefore, inclusion of supply from the Reserved Sites would increase the supply buffer marginally. This approach is supported by TW as sound and provides sufficient allowance for any under-delivery of housing from the sources of supply.

**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?**

7.1.18 The PPG states “*local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. This contribution is based on the amount of accommodation released in the housing market.*” **[PPG ID: 68-035]**

7.1.19 In terms of how plan-making authorities count specialist housing the PPG states “for residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published Census data.” **[PPG ID: 63-016a]**

7.1.20 The Census data demonstrates an average of 1.81 adults per household within Wyre Forest [ONS: CT0774]. Utilising this as a conversion rate for the purposes of supply would provide the following additional supply from C2 commitments based upon the Five Year Housing Land Supply Report **[ED10a – Appendix G]**:

- 148 bedspaces/1.81 conversion rate = 82 dwellings total

7.1.21 It should be noted that 73 bedspaces have already been delivered and therefore 40 (of the 82 dwelling total) should be added to the ‘Completions’ total with the remainder added to the ‘Commitments not yet started at 1st April 2019’ total within Table 6.0.2 of the Local Plan.

7.1.22 No contribution should be assumed to the Class C3 supply beyond the identified commitments.

**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?**

7.1.23 The adequacy of a rolling five year housing land supply within the District should be measured against the housing requirement of 276dpa and not the standard method local housing need which represents a minimum starting point.

7.1.24 Consideration of C2 supply should be considered separately to avoid double counting.

**7.2 (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?**

7.2.1 Subject to the following modifications, the housing trajectory is considered soundly based:

- Removal of the proposed windfall allowance within the trajectory;
- Inclusion of an element of C2 provision within housing supply;
- Application of a 5% lapse rate to all unimplemented residential sources of supply

7.2.2 The changes identified above would result in a trajectory that would provide 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 and a reasonable prospect that a rolling 5-year supply of deliverable sites will be maintained from the date of the Plan's adoption.