
Matter 7 Hearing Statement

Wyre Forest District Local Plan Examination
Response on Behalf of Gaynor Gillespie and W4
Estates Limited

Representor ID: 859769

Questions: 7.1a, c, f and 7.2



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1. Introduction

1.1. Introduction

- 1.1.1. Savills has been instructed by Gaynor Gillespie and W4 Estates Limited to submit a Hearing Statement in response to Matter 7 (Questions 7.1a, c, f and 7.2) of the Wyre Forest District Local Plan Examination.
- 1.1.2. Gaynor Gillespie and W4 Estates Limited are promoting land (ref WFR/ST/1) that was shown by Wyre Forest District Council (WFDC) to be included within the proposed Core Housing Site to the east of Kidderminster within the Preferred Options consultation document, but was removed by WFDC from subsequent consultation stages of the emerging Local Plan.

2. Matter 7: Housing Land Supply

2.1. Question 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?

- 2.1.1. Our client notes that the committed housing sites for the District (including proposed allocations) have been considered within the latest WFDC Five Year Housing Land Supply Report¹.
- 2.1.2. However, as set out within our client’s responses to Matters 1, 3 and 5², the wider assessment of potential sources of housing supply through the suite of evidence base documents accompanying the Local Plan review process, which seeks to justify the proposed Local Plan allocations, is not considered to be

¹ Examination Documents ED10 and AD10A. WFDC Five Year Housing Land Supply Report at April 1st 2020.

² Gaynor Gillespie and W4 Estates Limited responses to Matters 1, 3 and 5.

consistent or reflect the most up to date information available, notably with respect to ecological / landscape matters, in the consideration of potential housing site WFR/ST1 (Land at Captains).

2.1.3. Land at Captains is included on the WFDC Brownfield Land Register and site-specific assessment work undertaken by Swift Ecology and appended to previous representations³ identified that the potential ecological / landscape constraints identified by WFDC are not absolute constraints to development and appropriate mitigation can be provided. Accordingly it is contended that the assessment process has not facilitated the inclusion of all of the most suitable, sustainable and deliverable sources of housing land supply in the Submission version of the Local Plan.

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

2.1.4. WFDC has identified an average lapse rate over the period from April 2008 to March 2020 of 4.35% and applied a 4% lapse rate to sites with permission and allocations⁴. Clarification is accordingly sought as to why WFDC is not applying an overall 4.35% lapse rate to sites with permission and allocations, to ensure that a consistent approach is followed.

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 that equates to 231dpa as proposed in document ED10?"

2.1.5. The NPPF⁵ states that local planning authorities should measure their five year housing land supply "against their housing requirement set out in adopted strategic policies". If the adopted WFDC Local Plan annualised C3 housing target figure differs from the current standard method calculation of 231dpa then the alternative adopted figure should be used for calculating the five year housing land supply. Therefore if the housing target for the new Local Plan Period does not change from that set out within the Submission version of the Local Plan then the relevant annualised C3 housing target figure for WFDC to use should accordingly be 276dpa.

³ Stansgate Planning Consultation Response on behalf of Mrs. Gaynor Gillespie Ref EN/K/8797 (October 2019).

⁴ Examination Document ED10. WFDC Five Year Housing Land Supply Report at April 1st 2020. Paragraph 31 and Table 13.

⁵ NPPF paragraph 73.

2.2. Question 7.2

2.2.1. *“(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?”*

2.2.2. The WFDC housing trajectory appears to be ambitious but could be achieved if any (potential) constraints associated with the sites can be effectively dealt with, the planning application process for each site is discharged in a timely and efficient manner and there are no significant delays to the adoption of the Local Plan.

2.2.3. WFDC would however be in a more comfortable position to ensure that it can make up the shortfall in the delivery of the housing requirement from the start of the Plan period within 5 years from the adoption of the Plan, and also provide a buffer to allow for potential delays to the delivery of some of the trajectory sites, if it is able to include delivery from additional sites within the first 5 years following the adoption of the Local Plan. Consideration should therefore be given to making additional allocations on suitable, deliverable sites in order to provide a sufficient supply of sites to achieve this.

