

WYRE FOREST LOCAL PLAN EXAMINATION
MATTER 7 – HOUSING LAND SUPPLY (HLS)

Inspector's issues and questions in bold type.

This Hearing Statement is made for and on behalf of the HBF, which should be read in conjunction with our representations to the pre submission Local Plan consultation dated 17th December 2018. This representation answers specific questions as set out in the Inspector's Matters, Issues & Questions document (ED16) published on 19th October 2020.

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?

The Council's evidence on HLS is set out in 5 YHLS Report (ED10) and its Appendices (ED10A) together with Engagement Statement for 5 YHLS (ED12) and its Appendices (ED12A). Overall potential sources of HLS have been adequately assessed.

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

The Council has applied a lapse rate of circa 4% to existing planning permissions and site allocations based on collated evidence of non-implemented consent between 2008 – 2020 (Table 11 of ED10). Although the number of lapsed permissions is identified for small sites (less than 10 dwellings) and larger sites, a differentiated percentage is not provided. The Council should clarify if there is any significant difference between lapse rates for small and larger sites.

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?

As shown by C2 trajectory in Appendix G of ED10 there is no certainty about the future delivery of C2 developments because of this lack of detailed information no account should be taken of any contribution to the C3 supply by completion of C2 developments 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?

As stated in the 2019 NPPF (para 73), the 5 YHLS should be measured against the adopted housing requirement not the Local Housing Need figure. Table 14 of ED10 correctly sets out the 5 YHLS calculation, which shows a housing supply of 5.6 years.

7.2 (i) Overall, is the housing trajectory soundly based?

Throughout the plan period the housing trajectory in Appendix F of ED10 is heavily dependent on the delivery of two strategic sites north-east of Kidderminster at the former Lea Castle Hospital site owned by Homes England and an eastern extension to the town under option to Taylor Wimpey, both of which are anticipated to deliver circa 100 dwellings per annum. The soundness of these proposed delivery rates will be discussed and tested in detail during Matters 4 & 5 Examination Hearing Sessions.

(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?

As set out in the NPPG, the shortfall of 236 dwellings should be made up within the first 5 years (ID 68-031-20190722). There is a reasonable prospect of delivery within 5 years of adoption of the Local Plan subject to the Council's assumptions in the housing trajectory been found sound.

(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?

If the Council's overall HLS and housing trajectory are found sound, there is a reasonable prospect that a rolling 5-year supply of deliverable sites will be maintained.