



**Wyre Forest District Council**  
**Local Plan 2016-2036**

**Examination**

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

**Wyre Forest District Council Response**

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## **Wyre Forest District Council**

### **Wyre Forest District Local Plan (2016-2036) Examination**

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

**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? In particular:**

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

7.1.1 The Five-Year Housing Land Supply Report April 2020 (ED10/10A) gives details of all the sites considered to form part of the housing supply. The Planning Policy team maintains a database of all sites with extant planning approvals. This database is updated mostly on a weekly basis. This database includes all sites with detailed planning permission for residential development, prior approvals, outline approvals plus details of sites on the Brownfield Land Register with Permission in Principle approvals. Information on site progress is obtained from several sources including Council Tax, Building Control and NHBC. Officers also report back from site visits on any progress seen. The sites feeding into the supply are listed in the appendices at ED10A.

7.1.2 Those sites which do not yet have an extant planning approval, but which nevertheless form part of the housing supply, are listed at Appendix E of the WFDC Housing Land Supply Report April 2020 (ED10A). This site list has been assembled following discussions with Development Management officers and follows on from pre-application enquiries. Developers and their agents were also requested to submit details of site progress and expected delivery timescales. These details can be found in the WFDC Engagement Statement for Five Year Housing Supply (ED12/12A). This is the third year that this process has been undertaken.

7.1.3 An analysis of small windfall sites completed since 2008 has been undertaken. This is shown at Table 10 in ED10. This shows that such sites which have not been allocated through the Local Plan process make an important contribution to the overall housing supply. The table also shows the contribution that Prior Approvals (for less than 10 dwellings) have made since 2014/15. The Appendices at ED10A also show that there are large numbers of such approvals which have yet to be fully implemented, some of which have the potential to provide over 30

dwellings. These small sites are expected to continue to be a very important source of housing supply going forward and thus an allowance of 56 dwellings is added to the supply from year 3.

- 7.1.4 For the reasons given above, the Council considers that the potential sources feeding into the housing land supply have been adequately assessed and that the allocated numbers of dwellings are reasonable.

**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?**

- 7.1.5 The Council considers that the estimates of site capacities for the site allocations and other identified sites are justified. For the majority of allocations, the site capacity is based on a detailed site layout which has been submitted as part of the development management process. For other sites, detailed technical work has been undertaken which has been fed into a development framework. Please note that there have been revisions to a number of site capacities since the Regulation 19 Consultation. The revised capacities are shown in the tables at the back of ED10A. There are, however, some sites which are expected to have a mixed use and for some of these the final site capacity will depend on the final mix of uses included on the site. This is especially the case with some of the redevelopment sites in Kidderminster and Stourport-on-Severn Town Centres such as BHS/2 Bromsgrove Street, BHS/16 Timber Yard and AKR/2 Cheapside. Final site capacities will not be known until detailed schemes have been worked up as part of the planning application process. It should be noted that a question on viability, infrastructure provision and any delivery constraints was asked at Question 4 of the Housing Sites Delivery Information Request (see ED12A).

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

- 7.1.6 The Council considers that the implementation of a lapse rate of 4% on all unimplemented planning permissions and allocations is justified. This is based on an analysis of unimplemented residential permissions since 2002 as set out in Table 11 of the Five-Year Housing Land Supply April 2020 (ED10). The analysis shows the percentage of lapsed dwellings each year against those outstanding broken down between major sites (10 or more dwellings) and smaller sites. The evidence shows that almost half of the lapsed dwellings were on smaller sites. There are 11 larger sites which have lapsed. Of these, 3 have plans being drawn up for redevelopment. If a site has a renewal of planning permission and then goes under construction, it no longer counts as a lapse and the data is removed from the table. Carpets of Worth in Stourport-on-Severn had

approval for 159 dwellings which lapsed in 2016/17. The site is now in the process of being sold to a national house builder and a full application was received in late October 2020. Another site for 21 dwellings in Rock which lapsed in 2008/9 now has Permission in Principle on part of the site and plans have been drawn up for up to 24 dwellings. A further brownfield site in Stourport which lapsed in 2019/20 has interest from a Registered Provider. Thus, it can be shown that Wyre Forest has a minimal level of non-implementation of planning approvals and thus a lapse rate of 4% is justified. The methodology for calculating the lapse rate is based on that used in the South Worcestershire Development Plan in 2016 where the Planning Inspector concluded that the is was a robust and sound method for applying a non-delivery discount to commitments. There is no reference in the NPPF to lapse rates. However, the Glossary definition of 'Deliverable' says that sites that are not major development and sites with detailed planning permission should be considered deliverable until permission expires...'

**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?**

- 7.1.7 The Council believes that a 5% buffer should only be added to the housing land supply if the Council does not fix the supply through the Examination process. However, if the supply is fixed through the examination then a 10% buffer would need to be added. This fixed supply would only be until 31<sup>st</sup> October 2021 if the Plan is adopted by the end of April 2021 or if after that date, the supply would be fixed until 31<sup>st</sup> October 2022. However, it should be noted that a revised standard method was consulted on in summer 2020 and if this is adopted the requirement in Wyre Forest would be higher than that proposed through the Local Plan. The figure using this proposed method for Wyre Forest is currently calculated at 353 dpa. However, the proposed method, if adopted, would not apply to this Local Plan.
- 7.1.8 Footnote 39 of the NPPF refers to past delivery being measured against the Housing Delivery Test (HDT). The results of the first two HDT measures have now been published (February 2019 and February 2020) and Wyre Forest has achieved 115% and 99% respectively. This latest result means that only a 5% buffer is required for the purposes of the 5-year land supply at April 2020. The results of the 2019 HDT are shown at Table 9 in ED10.

**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?**

7.1.9 The standard method also includes uses such as communal housing so these should be factored into the supply side. However, at the present time in Wyre Forest Class C2 developments are minimal. There has been one development completed in the early part of the Plan period of 67 beds. Using the ratio of 1.8 bedspaces to 1 dwelling, this development has potentially provided the equivalent of 37 dwellings. Another development of 66 bedspaces went under construction at Silverwoods in Autumn 2020. It can be argued that a single person living alone who goes into residential C2 care will free up a dwelling but where that person is part of a 2-person household a dwelling will not be available hence the 1.8 ratio. A C2 requirement of 487 bedspaces would be equivalent to 271 dwellings, approximately one year's supply. Thus, it could potentially be argued that 271 dwellings should be removed from the overall Plan requirement. However, the Housing Needs Study (HOU01) at page 11 suggests that the C2 requirement is in addition to the 276 dwellings. Specialist older person dwellings such as extra care and retirement housing is classed as C3 and forms part of the overall housing need. This type of dwelling is completely self-contained with its bathroom, kitchen etc. although there may be some communal facilities available on-site. Over the Plan Period it is estimated that an additional 1,640 units of older persons accommodation will be required over the Plan period with 1,174 of these being C3 sheltered dwellings and 487 being required as C2 residential care.

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

7.1.10 ED10 sets out two different calculations on page 11. The first calculates the 5 year housing land supply at 1<sup>st</sup> April 2020 using the standard method based on a requirement of 231 dpa adding a 5% buffer as housing delivery in Wyre Forest has not fallen below 85% of the requirement over the past 3 years as per paragraph 73 of the NPPF. The second table estimates what the 5 year housing land supply would be at 1<sup>st</sup> April 2021 using an annual requirement figure of 276 plus a 10% buffer as set out in the NPPF at paragraph 73 (for those local planning authorities looking to fix the housing supply via Local Plan examination) and taking into account the projected shortfall.

### **Q7.2(i) Overall, is the housing trajectory soundly based?**

7.2.1 The Council believes that the housing trajectory shown on page 25 of ED10A to be soundly based. The data behind the trajectory is set out on pages 26-29 and has come from several different sources including detailed questionnaires sent out to developers, landowners and their agents asking about housing delivery. Details of the developer responses can be found in ED12A. The trajectory details the projected housing delivery for all the proposed site allocations across the Plan period to 2036 together with other sites in the planning system. A windfall allowance is also included from year 3. The justification for this windfall allowance is set out on page 7 of ED10.

### **Q7.2(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?**

7.2.2 The Council is confident that the shortfall in development from the start of the Plan period in 2016 can be made up within 5 years of the Plan's adoption. Housing delivery in the first four years of the Plan period was only 780 dwellings net of demolitions and retained dwellings. This is a shortfall of 324 dwellings on a requirement of 276 dpa as proposed in the Submission Plan. The housing trajectory shows a projected delivery for 2020/21 of 364 dwellings. It is not known at this stage how Covid-19 has impacted on housing delivery with most housing sites closed for 3 months at the start of 2020/21. All the allocated sites shown as completing on the housing trajectory are still on course to do so by the end of March 2021 which would give 253 completions. Details of the larger non-allocated sites which are expected to complete during 2020/21 can be found in the Developer Engagement Report Appendices ED12A (see pages 56 and 68). The largest of these non-allocated sites is a conversion of the upper floors of Towers Buildings in Kidderminster Town Centre which has various approvals in place for a total of 55 flats including a roof-top extension. Work is well progressed at this site and is on track to complete most of the units before the end of March.

7.2.3 If actual completions in 2020/21 approximate to the 364 projected in the housing trajectory, this would mean that there would be 1144 completions over the first 5 years of the Plan period and thus a shortfall of 236. If this is apportioned across the next 5 years, it would mean an additional 47 dwellings would be required above the 276 per annum. The housing trajectory projects completions of between 492 and 691 dpa from 2021-2026 and thus the Council is confident that any shortfall could easily be made up soon after the Plan is adopted. Much of this supply comes from existing brownfield allocations which already have planning approval and are either on site or about to start in early 2021 such as

Churchfields (BW/1), Stourminster School (OC/11), Silverwoods Extra Care extension (FPH/23) and Lea Castle Hospital (WFR/WC/15).

**Q7.2(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?**

- 7.2.4 The Council is confident that a rolling 5-year supply of deliverable sites will be maintained from the date of the Plan's adoption. The site schedule behind the housing trajectory on pages 26-29 of ED10A shows the proposed delivery schedules for all the allocations. Many of these allocations have been brought forward from either the Kidderminster Central Area Action Plan or the Site Allocations & Policies Local Plan. These sites will mostly be developed in the next 5 years 2021-26. ED11 shows the indicative phasing periods for the allocated sites. The 20-year Plan period has been divided up into 5-year phases with phase 1 being 2016-21, phase 2 2021-26, phase 3 2026-31 and phase 4 2031-36.
- 7.2.5 The large Eastern Extension proposed for development by Taylor Wimpey is programmed for development over 15 years starting in 2021/22. This scheme has already received formal pre-application advice from both WFDC and County Highways. An EIA Scoping Opinion was requested in March 2020 (20/0228/SCO) for proposed development comprising up to 1400 dwellings, a community hub, a primary school, green infrastructure and associated infrastructure. A detailed response was made in June 2020. A hybrid application will be prepared ready for determination on adoption of the Plan. The site is mostly in the ownership of a single landowner and Taylor Wimpey has agreement to develop the land.
- 7.2.6 The other large proposal revolves around the Lea Castle Hospital site which already has permission for 600 homes and contractors are now on site. The wider area of land proposed for delivery of a further 800 dwellings together with community facilities and employment land is in Homes England ownership. There are not thought to be any impediments to bringing this site forward as proposed with development of the hospital site expected to complete in 2029 and the wider area by around 2032 depending on how many developers are involved.