
Matter 2 Hearing Statement

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

Representor ID: 859769

Questions: 2.1

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Hearing Statement

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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 2 (Question 2.1) 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 2: Local Housing Need and the Need for Employment Land

2.1. Question 2.1

“Is the local housing need figure of 5,520 dwellings for the period 2016-2036 (276 dwellings per year (dpa) a sound basis for the Plan? Particularly, is the figure adequately informed by: a) the implications of the population and household projections in the past decade (including the 2018-based projections published in 2020) and alternative trend scenarios for population growth, household formation rates, net migration and economic factors; b) affordability and the need for affordable housing; and c) the Government’s objective of significantly boosting the supply of homes.”

- 2.1.1. As a starting point, local authorities should follow the standard method for assessing its minimum local housing need¹. The PPG² identifies that the 2014-based household projections should be used. The 2014-based household projections currently (i.e. using a 2020 base date and the 2019 affordability ratio) give a local annual housing need figure of 231 dwellings per year under the current standard method and 353 dwellings per year under the proposed new standard method³. It is however recognised that the proposed new standard method is expected to be revised and has not yet come into force.

¹ NPPF paragraph 60.

² PPG Paragraph: 006 Reference ID: 2a-006-20190220 Revision date: 20 02 2019.

³ MHCLG. Changes to the current planning system: Consultation on changes to planning policy and regulations (August 2020).



- 2.1.2. The PPG⁴ also states that local authorities can demonstrate ‘circumstances’, such as past trends of growth, previous levels of housing delivery or where assessments of need demonstrate a figure higher than that arising from the standard methodology to justify a housing target that is higher than the minimum local housing need.
- 2.1.3. The Government’s main reason for disregarding the 2016-based household projections was the fact that in many cases it produced a figure using the standard methodology process that was lower than the equivalent figure calculated using the 2014-based projections, taking the Government further away from its target of delivering 300,000 new homes a year.
- 2.1.4. Our client welcomes the choice made by WFDC to base its approach to identifying its local housing need figure on more recent (higher) household projections on the basis that it “*wishes to be ambitious with its housing requirement figure in order to support economic growth and affordable housing delivery*”⁵. The approach that WFDC is taking would assist with boosting the supply of homes over and above what the local housing need would be based on the current 2014-based projections (c.19% increase).
- 2.1.5. Through extension of this logic, and to provide further support to economic growth and affordable housing delivery in the District, particularly during the transition towards experiencing the full impact of a post-pandemic and post-Brexit economy, our client considers that WFDC should reassess its local housing need based on the most up to date (2018-based) projections, rather than just rely on the 2016-based projections. The Government has not yet updated its guidance on assessing housing need in the light of the outcome of the 2018-based projections, but there is still considered to be an opportunity for such an approach to be used by WFDC to demonstrate demographic-based ‘circumstances’ to plan for more than its minimum local housing need, as allowed in principle by the PPG. The Government is supportive of ambitious Councils wanting to plan for growth where this adequately reflects current and future demographic trends⁶.
- 2.1.6. The ONS 2018-based household projections⁷ identify a projected change of 3,097 households between 2020 and 2030 (equivalent to 310 households per year) for Wyre Forest. The ONS median workplace-based affordability ratio for 2019 for Wyre Forest District is 7.12. This creates an adjusted average minimum

⁴ PPG Paragraph 006 ID 2a-010-20190220

⁵ Examination Document SD01. WFDC. Wyre Forest District Local Plan 2016-2036 Submission Document (January 2020). Paragraph 6.5.

⁶ PPG Paragraph: 006. ID 2a-010-20190220.

⁷ ONS 2018-based household projections for local authorities and higher administrative areas within England (released 29 June 2020).

annual local housing need figure of 370 dwellings. If WFDC planned to meet this level of growth then it would be able to amply demonstrate that it would be supporting the Government's objective of significantly boosting the supply of homes, as required by the NPPF⁸.

- 2.1.7. The Housing Needs Study⁹ identifies a net annual imbalance of 158 affordable dwellings per annum. This is a significant number given that WFDC is currently planning to meet an annual target of 276 dwellings per annum (and out of which WFDC is currently targeting 90 dwellings per annum to be affordable¹⁰). The proposed affordable housing provision for the District is 25% on housing sites of 10 or more dwellings. Therefore WFDC is reliant on the delivery of a number of sites for 100% affordable housing in order to meet the annual affordable housing target.
- 2.1.8. The annual affordable housing target should also be viewed in the context of the past delivery of affordable housing in the District. 831 affordable dwellings were completed over the period 2010-2020 (averaging 83 dwellings per annum)¹¹, which equates to 53% of the identified net annual affordable need imbalance or 92% of the proposed annual delivery target for the Plan period.
- 2.1.9. In order to provide a sound basis for achieving a significant lift in affordable housing delivery in the District, to meet or exceed the WFDC target of 90 affordable dwellings per annum and thereby reduce the affordable housing shortfall and start to redress the overall worsening affordability situation in the District, then a significant step change in housing delivery through the emerging Local Plan, across a sufficient variety and amount of land, is considered to be necessary. The PPG¹² recognises that an increase in the total housing figures for a local authority may be considered where it could help to deliver affordable housing.
- 2.1.10. Based on the latest demographic and affordable housing delivery data it is contended that it is not sufficient to just plan for an annual average of 276 dwellings across the Plan period. It is accordingly proposed that WFDC should plan for delivery that meets a local housing need based on the 2018-based household projections, which would provide a robust opportunity for increasing affordable housing delivery within the District and for significantly boosting the overall supply of homes.

⁸ NPPF Paragraph 59.

⁹ Examination Document HOU01. Arc. Wyre Forest District Housing Needs Study 2018. Final Report (October 2018). Table 5.1. Page 52.

¹⁰ Examination Document SD01. WFDC. Wyre Forest District Local Plan 2016-2036 Submission Document (January 2020). Policy 8B.

¹¹ Examination Document ED3. WFDC Housing Topic Paper (June 2020).

¹² PPG Paragraph: 006. ID: 2a-010-20190220.

