
WYRE FOREST LOCAL PLAN, MATTER 7

Housing Land Supply

Campaign to Protect Rural England (Worcestershire Branch)

December 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:

1. As set out in Matter 2, CPRE considers an allocation figure of 4851 C3 dwellings is sufficient including a 5% buffer, (4067 dwellings with a windfall allowance) is sufficient. This is generous, in our view, as it does not include other supply factors included below, as well as the impact on C3 dwellings of the C2 provision.

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. CPRE does not consider that housing supply has been adequately assessed. As set out in Matters 2 and 3, a small site windfall allowance of 56 dpa (784 altogether) is justified based on previous experience and may well be exceeded due to changes in other requirements post-COVID-19, as well as sites which are identified as unavailable at present but may become available during the plan period, as set out in more detail in Matter 2.

3. We also consider it is likely that there will be at least some larger windfall sites as the retail and leisure sector adjusts to post-COVID-19 requirements.

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?

4. CPRE is not in a position to comment on this in detail. As set out in Matter 3 we consider the Density requirements are lower than might be considered warranted given the 'exceptional circumstances' claim for Green Belt release. Moreover, we are not aware of a review of site capacity taking account of a 30 dpa requirement, which seems to us a very modest policy approach. CPRE is not, therefore, convinced that all site capacities are based on the most efficient use of land, even accounting for environmental and other constraints.

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

5. As set out in Matter 2 the average ten-year lapse rate for Wyre Forest is modest at 4.35%, suggesting sites with planning permission rarely do not go ahead. This does not surprise us given that Wyre Forest is, as described by the Council themselves, an area attractive to in-migrants. Of course, this lapse rate does not necessarily mean development does not go ahead on those sites. It may be delayed.

6. Furthermore, there is no particular reason to believe that the lapse rate will increase. We do not believe any lapse rate at all should be applied to windfalls (as in the FYLSU) for the simple reason that they are based on Completions not Permissions, so any lapse rate is already accounted for.

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. We consider a 5% buffer for under-delivery is adequate. That is the approach taken in the FYLSU, which we agree with (the exception being windfalls). Given the strategic nature of some allocations it may well be that this buffer is generous, and could be counteracted by density benefits gained from a more suitable density policy.

8. We do not believe the 15% over allocation in the Plan is justified and goes against, both the evidence on actual delivery and the Council's own view of the attractiveness of Wyre Forest to developers. As we say in Matter 2, there is also an element of 'affordability' over-allocation inherent in the Standard Methodology which reduces the need for a buffer.

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?

9. We believe it would. Furthermore, it may be that, given the age profile of Wyre Forest, additional C2 development would be preferable to offset some C3 need, especially given difficulties in ensuring planning permissions can include age-related conditions. There are 1,642 C3 homes identified specifically for older people in the Plan (Policy 8E) as well as the 487 C2 homes, and the balance may need to be reviewed as the Plan progresses.

10. We are not in a position to comment on whether there should be a direct correlation between C2 provision and a reduction in C3 provision or whether some percentage should be applied (others may have that understanding) so we have not included this in our calculations of housing need, another reason the CPRE requirement figure is, in our view, robust.

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?

11. Notwithstanding the issues above, the 5-Year Land Supply figure should be the correct Standard Methodology Figure and this should be applied to the Plan as well. As set out in Matter 2, the justification for using the ONS2016 figures (which are actually 242 dpa) is undermined by the excess housing being provided by neighbouring authorities relying on the ONS2014 figures.

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?

12. CPRE considers there is an adequate supply based on the correct use of the ONS2014 Standard Methodology Calculation. The 5-Year land supply currently stands at a respectable 7.18 years so we do not believe it is at risk.

13. We do not support front-loading the trajectory in the early years. This approach risks planning for more homes in the early years than are delivered and then being accused of failing to deliver the target. We are not anyway convinced that a dearth of sites has held back house-building in Wyre Forest District, so we do not see the need for a deficit to 'catch up' on.

14. Accordingly, the trajectory should be a flatter one, (perhaps even from 2021-2031) with only a small drop off at the end of the plan period reflecting the demographic trajectory post 2031.