

# clearthinking

COMMERCIAL PROPERTY ADVICE



**Wyre Forest District Local Plan 2016 - 2036 Examination**  
**Town and Country Planning Act 1990**  
**Planning and Compulsory Purchase Act 2004**  
**Localism Act 2011**

---

**Hearing Statement**

**Matter 7- Housing Land Supply**

**On Behalf Of:**  
**Taylor Wimpey West Midlands (ID 1126171)**

**Prepared By:**  
Simon Hawley BA (Hons) MA MRTPI  
Harris Lamb | Grosvenor House | 75-76 Francis Road | Edgbaston | Birmingham B16 8SP  
Telephone: 0121 455 9455 Facsimile: 0121 455 6595 E-mail: [simon.hawley@harrislamb.com](mailto:simon.hawley@harrislamb.com)

Job Ref: P1794

Date: December 2020

## **CONTENTS**

### **1.0 MATTER 7 - HOUSING LAND SUPPLY**

## 1.0 MATTER 7 – HOUSING LAND SUPPLY

1.1 This Hearing Statement has been prepared by Harris Lamb Planning Consultancy (“**HLPC**”) on behalf of Taylor Wimpey West Midlands (“**Taylor Wimpey**”) in response to the Inspector’s Matter 7 questions. The Inspector’s questions are set out below, alongside Taylor Wimpey’s response.

***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 is the estimated number of dwellings from these sources (including extant planning permissions, windfalls, prior approvals and site allocations) reasonable?***

1.2 We have no reason to believe that the “completions”, “under construction” and “commitments not started” figures set out in Table 6.0.2 of the emerging Plan (SP1) are not robust. We comment on the lapse rate proposed for the “commitments not started figure” in our response to question 7.1c.

1.3 We have no particular concerns with the various sites that are proposed to be allocated in order to deliver the emerging Plan’s housing requirement. The Housing and Economic Land Availability Assessment 2019 (HELAA) (HOU04) provides an assessment of the suitability of a significant number of potential housing sites. The Site Selection Paper (SSP01) explains the rationale for the identification of the preferred allocations, and its conclusions are broadly supported.

1.4 It is noted that Table 6.0.2 of the emerging Local Plan does not include windfalls as a source of supply. This approach is supported. Paragraph 70 of the Framework advises that an allowance should only be made for windfalls as a source of supply when there is ‘compelling evidence’ to do so.

1.5 Table 10 – Windfall Completions Since 2008, of the Five Year Housing Land Supply Report at 1<sup>st</sup> April 2020 (ED10) advises that on average there have been 56 windfall completions each year since 2008. This is not, however, considered to be robust evidence to support the inclusion of a windfall allowance in the Plan for the following reasons:

- It is not clear what proportion of the windfall completions were on large sites. Large sites should be allocated in the Plan, and as such no allowance should be made for large site windfalls. Small site windfall completion figures are not provided to inform any potential small site windfall allowance.
- The Wyre Forest Site Allocations Plan and Kidderminster Central AAP was not adopted until July 2013. As such all residential completions prior to that date would have been on windfall sites unless the site was an allocation in the previous Local Plan, adopted in 2004.
- Wyre Forest have been unable to demonstrate a five year supply of housing land at certain points since 2008 (for example the Land off The Lakes Road, Bewdley appeal decision - APP/R1845/W/17/3173741 - March 2018, confirmed the District had a five year housing land supply shortfall). A more positive planning policy framework would have been created for the determination of residential applications at this time. This would have distorted the number of windfall planning permissions granted.

1.6 All these factors will have influenced the number of windfall planning permissions granted in the past and the corresponding number of completions. That being the case, past windfall rates alone should not be treated as compelling evidence that windfalls will form a robust source of supply.

***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?***

- 1.7 Policy 33 – Stourport on Severn Site Allocations, identifies the capacity of proposed allocation MI/38 – School Site, Coniston Crescent, as approximately 115 dwellings. As detailed in our Matter 6(ii) Hearing Statement we fully support the policy identifying the indicative capacity of this site as 115 dwellings. This quantum of development is required to generate funds to pay for essential maintenance work at Stourport High School. However, it is not realistically possible to deliver 115 dwellings on the site at an appropriate density and provide 40% Green Infrastructure, as required by Policy 14 – Strategic Green Infrastructure. This would necessitate a density in excess of 52 dpa on an edge of settlement site. That being the case, Policy 33 – Stourport on Severn Site Allocations and Policy 33.16 – School Site, Coniston Crescent MI/38, should confirm that a reduced amount of Green Infrastructure will be provided on this site.

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

- 1.8 Footnote 8 of the Plan advises that a 4% lapse rate is applied to the “commitments not started” figure in Table 6.0.2 of the draft Plan. The Five Year Housing Land Supply Report at 1<sup>st</sup> April 2020 (ED10) advises that the lapse rate in the District since 2002/03 has been approximately 4.35%. That being the case, the lapse rate applied to the Plan is slightly lower than the actual lapses to date. It would, in our view, be appropriate for the Plan to include lapse rate of 5%, as opposed to the 4% proposed, on the side of caution. However, the difference this would make to the total supply of sites would be minimal in the context of the overall housing requirement. As such, it is not considered to be essential.

***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?***

- 1.9 The capacity of the proposed housing allocations in the emerging Plan is approximately 15% greater than the overall housing requirement. This

approach is supported. Additional flexibility is built into the Plan in order to help ensure that a sufficient number of dwellings will be delivered to meet the identified housing needs figure. It is not unusual for housing allocations to not deliver as expected due to unforeseen circumstances. For example, when detailed survey work is undertaken to support planning applications it may be established that there are constraints associated with certain sites that reduce their capacity, or the timing of their delivery.

- 1.10 The Housing Topic Paper (ED3) explains at paragraph 11.4 that legal advice has been sought on this matter, and the Council have been advised that it should allocate around 15% more housing than required to build in some flexibility for non-delivery of sites. An over-allocation of up to 20% was suggested by the Local Plans Expert Group which reported its findings to Government in March 2016. Wyre Forest District Council Members are keen to limit the amount of land taken out of the Green Belt; therefore, the over-allocation is limited to 15%. The 15% allocation is, therefore, at the lower end of the 15%-20% range considered.

***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?***

- 1.11 Paragraph 6.6 of the emerging Plan advises that the housing requirement identified in the Housing Needs Study (HOU1), that has informed the emerging Plan, reflects the necessary housing required to satisfy housing need, plus additional need arising from the necessity to provide additional affordable housing and opportunities for economic development. The Housing Needs Study concludes that there is a requirement for 5,520 C3 properties, and a further 487 C2 dwellings to meet a specific need. This is the Local Authority's most recent assessment of the requirement for C2 accommodation.

- 1.12 Given that separate housing requirement figures have been identified for C2 and C3 accommodation, the provision of C2 dwellings should only be seen as contributing to the 487 C2 dwelling requirement, not the 5,520 C3 dwelling requirement.

***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?***

- 1.13 The five year housing land supply should be tested against the housing requirement figure of 273 dpa. Paragraph 73 of the Framework clearly states that local planning authorities should test their five year housing land supply position against their “housing requirement” set out in the Strategic Policies. Whilst the Standard Method identifies the “minimum” number of homes needed, it is not a housing requirement in its own right.
- 1.14 The emerging Plan and its evidence base documents confirm that it is necessary for the housing requirement in the Plan to be increased beyond this minimum Standard Method figure. As referred to in paragraph 6.6 of the emerging Plan, the 276 dpa requirement reflects the housing need plus the additional need arising from the necessity to provide affordable housing and opportunities for economic growth. We note that the Five Year Housing Land Supply Report at 1<sup>st</sup> April 2020 (ED10) at Table 14 confirms that the five year housing land supply position should be tested against the housing requirement to 276 dpa. This approach is supported.

***Q7.2 (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?***

- 1.15 A windfall allowance should not be included within the housing trajectory. As referred to in our response to Q7.1a, there is not compelling evidence that windfalls will be a reliable source of supply.

- 1.16 As set out in the NPPG the shortfall of 236 dwellings should be made up within the first 5 years (ID 68-031-20190722). In order to ensure that the shortfall in delivery is met in the early parts of the plan period, it is imperative that the proposed allocations in the Plan are bought forward for the development promptly.
- 1.17 Taylor Wimpey control the proposed allocation MI/38. As detailed in our Matter 6(ii) Hearing Statement, a planning application is being worked up for this site, which is expected to be submitted early in the New Year. It provides an opportunity to deliver approximately 115 dwellings within the first five years of the Plan period in a highly sustainable location.



# clearthinking

commercial property advice



COMMERCIAL AGENCY



PROJECT  
MANAGEMENT



BUILDING  
CONSULTANCY



PROFESSIONAL  
SERVICES



LAND & DEVELOPMENT



CORPORATE  
SUPPORT



VALUATION



INVESTMENT



RATING



PLANNING  
CONSULTANCY



PROPERTY  
MANAGEMENT