

Wychavon Five Year Housing Land Supply Report

2015

Includes: Position statement at 1 April 2015, methodology, analysis and evidence supporting the five year housing land supply calculation.

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1. Introduction

1.1 This report provides a full explanation of the five year housing land supply (5YHLS) calculation for Wychavon District Council as required by the National Planning Policy Framework (NPPF). It sets out the housing requirement, delivery to-date and identifies deliverable housing sites for the five year period 1 April 2015 to 31 March 2020. The report includes an appropriate in-depth analysis of sites with planning permission and those that are proposed allocations in the submitted South Worcestershire Development Plan (SWDP) to provide additional evidence about deliverability and to ensure that the supply calculation is robust.

2. Housing Requirement

2.1 Previously Wychavon had used the housing target set out in the West Midlands Regional Spatial Strategy (WMRSS) (2007) and more recently the West Midlands Regional Spatial Strategy Panel Report (2009). Although the WMRSS was revoked i.e. no longer part of the Development Plan in 2013 the housing figures nonetheless remained the most recent tested figures for Wychavon District. Subsequently a Court of Appeal decision (Dec.2013; St Albans Council vs Hunston Properties Ltd; case no. C1/2013/2734) ruled that a S78 planning inspector, in the absence of an up-to-date Local Plan housing requirement (as is the case for Wychavon), could not determine whether a local planning authority had a 5YHLS based on a constrained i.e. 'policy on' housing requirement figure typically set out in a Local Plan.

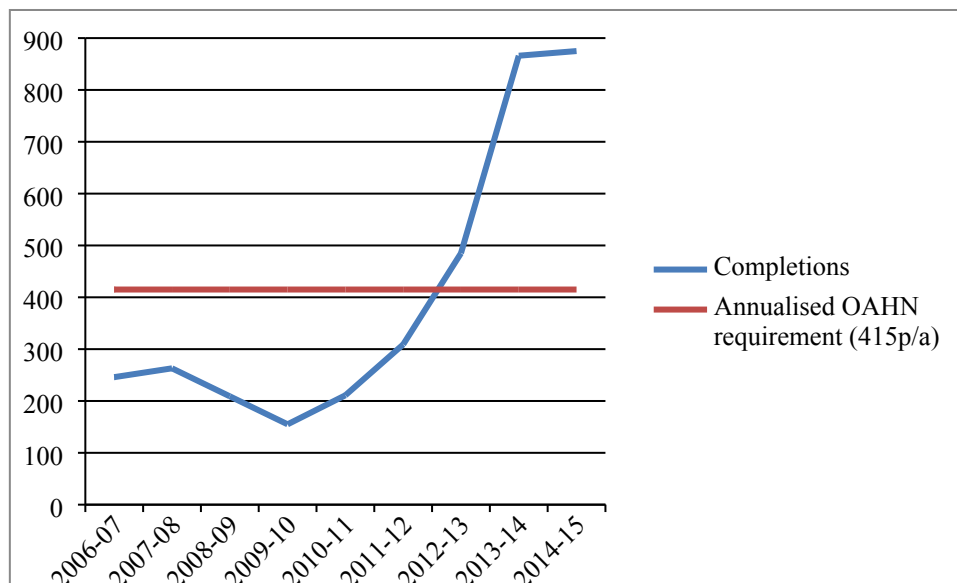
2.2 Consequently Wychavon subsequently used the 2010 Department for Communities and Local Government (DCLG) Household Projections as the housing requirement as they were considered to best represent the "unvarnished figures of household projections". Following this, the SWDP Examination Inspector tested the South Worcestershire Councils' revised evidence on the objective assessment of affordable and market housing need and concluded (31 March 2014 Inspector's Further Interim Conclusions on the Outstanding Matters Considered at the Reconvened Stage 1 Hearing¹) that for Wychavon District the full objectively assessed need for housing over the Plan period (2006-2030) is **9,950 dwellings**.

¹ <http://www.swdevelopmentplan.org/?s=Further+Interim+Conclusions>

3. Completions

3.1 Completions from the outset of the Plan period 1 April 2006 to 31 March 2015 are **3619**. Overall this is just below the cumulative annual requirement for completions from 2006; however completions over the last 36 months have increased dramatically with an all time high of **875** in the last monitoring year 2014-15. The last two years have seen a significant and maintained improvement in the delivery rates of new dwellings that is well in excess of the annual requirement. This demonstrates Wychavon’s success in addressing the previous shortfall by taking a proactive approach and approving a significant number of housing developments beyond the Wychavon District Local Plan (WDLP) GD1 development boundaries since 2010.

Figure 1 Completions in Wychavon District council from 1 April 2006- 1 April 2015



4. Calculating Past Undersupply

4.1 In dealing with past undersupply any shortfall in actual supply compared with the annualised requirement from 2006 to 2015 has to be calculated. The requirement as explained above is that recommended by the SWDP Examination Inspector (31 March 2014 Inspector’s Further Interim Conclusions on the Outstanding Matters Considered at the Reconvened Stage 1 Hearing) conducting the SWDP Examination of 9950 dwellings from 2006-2030, which equates to 415 dwellings per

annum. Therefore, the requirement for the nine years from 2006-2015 is 3735 and to establish the under supply all completions during this period are taken off this figure.

$$3735 \text{ (Requirement 2006-2015)} - 3619 \text{ (Completions 2006-2015)} = 116 \text{ (shortfall)}$$

4.2 To give an indication of the progress made in recent years the shortfall in 2011-12 was 1097 dwellings.

5. Addressing Past Undersupply

5.1 In terms of addressing the undersupply the Council will continue to adopt the so called 'Sedgefield Approach'. This is where any historic shortfall, from the Plan period, is dealt with in the first available five year period. Therefore for the purposes of this calculation the shortfall of 116 dwellings has been added to the five year target to be delivered within the first five years.

$$2075 \text{ (5 x 415 5 year target)} + 116 \text{ (shortfall)} = 2191 \text{ (5 year target including undersupply)}$$

6. Buffer

6.1 In accordance with the NPPF (paragraph 47) Wychavon is required to test it's supply of sites against it's housing requirement with an additional buffer to ensure choice and competition in the market for land. Wychavon has delivered well in excess of the annual housing requirement for the last 3 consecutive monitoring years and as such could reasonably apply a 5 % buffer to the five year supply target. A 5% buffer equates to an additional 110 dwellings.

$$2191 \text{ (5 year target including undersupply)} + 110 \text{ (5% buffer)} = 2301 \text{ (5 year target including undersupply with 5% buffer applied)}$$

6.2 Taking a more cautious approach the Wychavon has also tested it's 5YHLS position with a 20% buffer. A 20% buffer should be employed when there has been a record of persistent under delivery of housing. Given that there is remains a shortfall, albeit a marginal one, Wychavon will continue to apply a 20% buffer which equates to an additional 438 dwellings.

2191 (5 year target including undersupply) + 438 (20% buffer) = 2629 (5 year target including undersupply with 20% buffer applied)

7. Lead Times and Delivery Rates

7.1 Before explaining the different categories of sites which will deliver housing within Wychavon District in the next five years, it is important to set out the approach that has been taken by the Council to ensure that the supply is robust.

7.2 A substantial amount of detailed work has been undertaken to assess sites and to identify the number of dwellings that will be delivered within the next five years. Large sites (10 or more dwellings) have been carefully assessed as these represent 91% of the current sites with planning permission not yet started and are therefore an extremely important component of supply.

7.3 Where work is already underway on large sites officers have critically assessed the delivery rates to establish whether the total number of dwellings with planning permission can realistically be achieved within a five year period. Factors that can influence the delivery rate include the number of developers (outlets) on site, the type of site, e.g. brownfield / greenfield and any requirements for infrastructure provision. In most cases sites are small enough to easily be delivered within five years based on existing local build rates (see Appendix 4 for a site by site breakdown).

7.4 In looking at large sites where there has been no start made as at 1st April 2015 and for sites without planning permission developers, promoters and landowners have been engaged to understand their intentions for delivery. This information is provided in Appendix 7. This information has been considered in conjunction with local evidence regarding lead in times and delivery rates recently experienced in Wychavon so as not to simply rely without question on the statements and information provided by landowners, developers and house builders in respect of their own sites. In adopting this cautious approach the Council has assumed the following, unless there is extremely robust evidence to suggest otherwise:

1. On large sites where an application has been submitted but not yet determined it has been assumed that it will take 30 months until the first legal completion is achieved, unless there

are any other specific reasons that suggest otherwise. This has been reduced to 24 months where an application has been approved subject to a Section 106 agreement; 18 months where outline planning permission has been granted (i.e. a Section 106 signed); and 12 months where full planning permission has been granted. This is considered a cautious approach as it has been demonstrated in the district that developers are achieving initial completions within one year of getting full planning permission on the large sites unless there are site specific constraints (see Appendix 4). Local evidence demonstrates that the smaller large schemes, for example those between 10 and 20 dwellings are completely built out within 12 months once a house builder is on site.

2. A conservative delivery rate of 40 dwellings per annum per 'outlet' has been assumed for volume house builders (e.g. Taylor Wimpey, Bovis etc.) once a site is up and running and into its first full year of production although the local evidence provided in Appendix 4 shows that this has been higher in Wychavon District. This assumption is also supported by analysis undertaken by White Young Green of national house builders' annual reports looking at the number of sites and the number of completions over a particular year, although this work is not specific to Wychavon District. Where there is strong local evidence of a particular house builder delivering higher rates on a similarly sized site this has influenced officer assumptions about build rates and any assumptions are clearly stated in the text in either section 8 or 10.
3. In some cases for the large sites where it is known that affordable housing will be delivered separately to the market dwellings e.g. by a Registered Social Landlord the 40 dwellings per annum has been increased by 40% to 56 dwellings per annum.
4. Previously the location and proximity of sites coming forward has been taken into account as they may be in direct competition with each other and therefore may affect delivery rates. However, work produced by GL Hearn in relation to sites on the edge of Droitwich Spa (Droitwich Spa Local Housing Market Assessment, February 2013) suggests there would be no impact on build rates and this has also been borne out by several developments in Evesham being built out alongside each other with no detrimental effect on delivery. Therefore such caution is only really likely to be applicable in the more rural locations.

7.5 Although the evidence provided demonstrates that in most cases Wychavon is delivering above the levels of these assumptions, a cautious approach has been taken to ensure that the 5YHLS position is as robust as possible.

8. Sites with Planning Permission not Started or Under Construction

8.1 A full list of sites with planning permission not started or under construction (at 31st March 2015) is set out in Appendix 2.

8.2 Footnote 11 to NPPF Paragraph 47 is clear that all plots that have unexpired planning permissions “should” be included, *“unless there is clear evidence that schemes will not be implemented within 5 years, for example where they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.”*

8.3 All sites with planning permission have been reviewed and there are a few sites, for reasons set out below, that have been discounted as there is sufficient evidence that they will either not be implemented at all within five years, or due to phasing it is likely to take longer than five years to deliver the total number permitted.

8.4 To inform this decision-making process **all** large sites (10 dwellings and over) where there was no start on site at 1st April 2015 were sent a deliverability questionnaire (Appendix 6). The responses to this detailed questionnaire have been considered and taken into account when making assumptions about the delivery of these sites (all detailed responses are published in a table at Appendix 7). In most cases the phasing set out in section 7 of this report has been used as this makes more conservative assumptions than the developers and promoters have forecast. Again this is to make the 5YHLS position as robust as possible.

8.5 The Council has not relied upon C2 use in the five year supply calculations although this will continue to provide an element of C3 supply. The Council will scrutinise C2 applications in the future to ensure the use is correctly defined and where all the facilities for each unit (dwelling) are behind it’s own front door this will be classified as C3 and therefore contribute towards the 5YHLS. This approach is supported in the National Planning Practice Guidance (NPPG) (Paragraph: 037 Reference

ID: 3-037-20140306). At this point in time there are no applications affected by this approach included in the supply calculation.

8.6 A Summary of discounted sites with planning permission not started is set out below (for full assessment see Appendix 3):

07/00948 Former Gas Depot, Common Road, Evesham for 123 dwellings.

This site is not included in the five year calculation at all as it is considered undeliverable within five years due to the upfront cost of delivering the undercroft parking and current lack of demand for flatted development in Evesham. The applicant has submitted an extension of time application for this site which is currently being considered (W/15/00923/ET).

123 dwellings discounted.

12/00791 Former Midlands Electricity Depot, Worcester Road, Evesham, Worcestershire for 37 dwellings

This site is not included in five year calculation as its deliverability is now uncertain. An application 14/01783/PN for retail use of the site has been approved subject to S106 in April 2015. Therefore officers have taken a cautious approach and discounted this site assuming it is more likely to come forward for retail use.

37 dwellings discounted.

96/00597 Leedons Residential Park, Broadway, Worcestershire WR12 7HB for 112 dwellings

This scheme has two phases and a third area where there will be a change from 49 restricted holiday use homes to permanent residential. Phase 1 is well underway with a total capacity of 69 units; 56 are complete and 13 are under construction. Phase 2 has a total capacity of 131 with 1 complete, 67 under construction and 63 not started. Completions rates to-date (14 homes were completed in 2013/14, 8 homes in 2014/15 and a further 6 have been completed between April 2015 and July 2015) suggest that the 112 not yet started will not be completed within 5 years and only 50 of those already under construction are likely to be completed (please see page 16 where these have been discounted). Therefore none of the dwellings that have yet to be started are included in the five year supply, it is anticipated the site will continue to deliver over a much longer period of time.

112 dwellings discounted.

11/01073 Land North of Pulley Lane and, Newland Lane, Newland, Droitwich Spa for 500 dwellings

The site has outline permission for 500 dwellings. Redrow homes have submitted Reserved Matters for 250 dwellings 15/01418/RM on 1 June 2015 for Phase 1 of the scheme. The agent in completing the deliverability questionnaire anticipates that 245 dwellings can be completed in five years assuming a second developer is on board from 2017/18. Officers have been more cautious and assumed 200 homes will be delivered over five years as there is no named second developer.

300 dwellings discounted.

12/02336 Land North of Pulley Lane and, Newland Lane, Newland, Droitwich Spa for 265 dwellings

The site has outline permission for 265 dwellings. Persimmon has submitted Reserved Matters for 265 dwellings 15/01187/RM on 8 May 2015. Officers have assumed a start on site in 2016/17, with 20 dwellings completed in the first year and 50 there after. This means that 170 dwellings can be delivered within five years. These assumptions are below Persimmons delivery rates elsewhere in the District and are therefore considered cautious.

95 dwellings discounted.

12/02490 South of Pershore Road, Hampton, Evesham (also SWDP51/02) for 401 dwellings

This site has outline permission for the whole site (401) and full planning for 151 dwellings. There are two volume house builders on board (Bellway and Bloor Homes) and the developers have indicated the first phase of 250 dwellings can be built in five years, starting on site in August 2015. In line with recent Inquiry decisions officers have assumed 25 dwellings in the first year and 50 dwellings per annum thereafter. This is considered a conservative estimate as there are 2 volume house builders on board who have a proven track record in the district of higher delivery rates than those assumed e.g. Three Springs Road Pershore (see Appendix 4). In total Wychavon have assumed 225 dwellings will be built within the five year period.

176 dwellings discounted.

10/02896 Land between Roman Way and Copcut Lane, Salwarpe, Worcestershire for 740 dwellings

Work has commenced on site in April 2015. However, the developer has indicated that first completions will not be seen until 2016/17. The site has Reserved Matters for 343 of the 740 dwellings with 100 of those permitted being contained within a single large C3 extra care building. The developer has indicated that there will be 3 developers on board by 2017/18 (including an RSL to deliver the C3 extra care). The developer has indicated that 40 dwellings per annum per outlet

can be achieved which is in line with local delivery rates. However, officers have been more cautious and assumed 293 units by 2019 as this is the number established by Inspector Sims at Inquiry (193 dwellings + 100 extra care units) and an additional 56 for 2019-2020 dwellings. In total Wychavon have assumed 349 dwellings will be built within the five year period.

391 dwellings discounted.

12/02045 Land Adjacent Kilbury Drive off, Spetchley Road, Spetchley for 9 dwellings

This site has permission for 256 dwellings and is adjacent to the Worcester City boundary. The site has been identified as an urban extension for Worcester City as part of the emerging SWDP (policy SWDP45/3) and forms part of the Wider Worcester Area (WWA). Although 9 of the affordable dwellings are for Wychavon residents needs the site is not included in Wychavon's supply to avoid double counting.

9 dwellings discounted.

14/00430 Land including Gwillams Farm, Ombersley Road, Bevere for 17 dwellings

This site has permission for 17 dwellings and is adjacent to the Worcester City boundary. The site has been identified as an urban extension for Worcester City as part of the emerging SWDP (policy SWDP45/4) and forms part of the WWA therefore it is not included in Wychavon's supply to avoid double counting.

17 dwellings discounted.

14/00430 Land including Gwillams Farm, Ombersley Road, Bevere for 9 dwellings

This site has permission for up to 230 dwellings and is adjacent to the Worcester City boundary. The site has been identified as an urban extension for Worcester City as part of the emerging SWDP (policy SWDP45/3) and forms part of the WWA. Although 9 of the affordable dwellings are for Wychavon residents needs the site is not included in Wychavon's supply to avoid double counting.

9 dwellings discounted.

13/00696 Land between Leasowes Road and, Laurels Road, Offenham for 50 dwellings

Negotiations are on-going with the purchase of this site. Delivery may be delayed until later within the 5 year period. The Council have been cautious and assumed 25 dwellings will be completed in the 5 year period and 25 dwellings just after to reflect this.

25 dwellings discounted.

13/00276 Withyfields, Withybed Lane, Inkberrow for 37 dwellings

The applicant is currently appealing against a Highways condition which will delay submission of Reserved Matters. Although it is anticipated that this site is likely to be delivered within 5 years the Council have adopted a cautious approach and not included the site until the appeal decision has been made or an alternative access has been established.

37 dwellings discounted.

13/00132 Land Adjacent to, Sims Metals UK (South West) Limited, Long Marston, Pebworth for 380 dwellings

The applicant is required to submit Reserved Matters within 2 years of the Planning Inspectorate's decision, therefore by 2 July 2016. A major house builder has sought pre application advice for Phase 1. Officers assume the site will be delivered in a phased way as stated in the Appeal decision and started in July 2017. With 20 dwellings delivered in the first year and 40 thereafter. Therefore 100 dwellings are considered deliverable within 5 years.

280 dwellings discounted.

14/02743 Land West of, Station Road, Pershore for 260 dwellings

Phase 1 for 80 dwellings is currently under construction (commenced May 2015) with several footings already in by June 2015. In response to the deliverability questionnaire and in line with Persimmon delivery rates in the District they estimate that 30 dwellings will be completed in 2015/16 and 50 dwellings per annum thereafter. Officers consider this realistic. Some groundwork for Phase 2 is also under way.

30 dwellings discounted.

14/00951 Land at, Station Road, Pershore for 50 dwellings

This site is reliant on access from the development at 14/02743 above. Although the Persimmon site is under construction and the promoter has indicated that the site is deliverable within 5 years the Council have been cautious and assumed that this component of the larger site may come forward outside of the five years. This decision has also been influenced by the fact that there is currently no named developer on board.

50 dwellings discounted.

Total number of dwellings with planning permission not started = **4449**

Total number of short term undeliverable dwellings* with planning permission not started = **1691**

$$4449 - 1691 = 2758$$

Total number of deliverable dwellings* with planning permission not started = 2758

*within five years

A Summary of discounted sites with planning permission under construction is set out below (for full assessment see Appendix 3):

96/00597 Leedons Residential Park, Broadway, Worcestershire WR12 7HB for 112 dwellings

As highlighted on page 11 completion rates to date on this scheme (14 homes were completed in 2013/14, 8 homes in 2014/15 and a further 6 have been completed between April 2015 and July 2015) suggest that the 112 not yet started will not be completed within 5 years and only 50 of those already under construction are likely to be completed. Therefore 30 of the 80 dwellings under construction are discounted as part of the Councils cautious approach. It is anticipated the site will continue to deliver over a much longer period of time.

30 dwellings discounted.

Total number of dwellings with planning permission under construction = **420**

Total number of short term undeliverable dwellings* with permission under construction = **30**

$$420 - 30 = 390$$

*within five years

9. Sites Carried Forward from the Wychavon District Local Plan (2006)

9.1 There are a few sites that are carried forward from the WDLP through to the SWDP. Some of these already have the benefit of planning permission and have been built out already and are therefore accounted for elsewhere in the 5YHLS calculation. The remaining two sites that are being carried forward do not yet have the benefit of planning permission or a current application so are not included in the 5YHLS calculation. These sites have been reassessed by officers and as the

Council has not received any updated information in this monitoring year they have taken a cautious approach and removed them from the 5YHLS calculation. The two sites are the Garage High Street, Pershore (SWDP 46/1) and Garage Court, Abbots Road, Pershore (SWDP 46/4).

10. Deliverable Allocated Sites in the Submitted SWDP (2013)

10.1 All sites allocated in the submitted SWDP including: those with planning permission but not yet started; those with a resolution to grant planning permission; and those without planning permission were sent a deliverability questionnaire.

10.2 This questionnaire is sent annually to landowners, developers and promoters and provides an updated picture on the progress of the site, the intentions of stakeholders and highlights any slippage. Where the contact has not responded to the update request a previous response has been used along with officer's careful consideration of the factors relevant to the site. All responses have been scrutinised by officers and not simply relied upon without question.

10.3 The questionnaire includes questions about any known viability issues, any site specific constraints and more detailed questions around phasing and delivery. Questions include: when do you expect to start work on site (month/year)? How many outlets (house builders) do you envisage? How many completions do you expect to achieve each year (April to April)? And therefore how many homes do you anticipate being delivered on site within the next five years to April 2020? (See Appendix 6 for full questionnaire).

10.4 In assessing the questionnaires to ensure that the assumptions are as robust as possible **only sites where the landowners/ agents/developers have already submitted a planning application** have been included as deliverable SWDP sites. This is considered a conservative approach as there are a number of additional sites that are highly likely to be delivered within five years but the promoter has yet to submit a formal application.

10.5 The following sites have been included in the 5YHLS calculation as deliverable SWDP sites within five years:

SWDP47/1 Land to the north of Pershore (Wyre Road), Pershore

There are two current planning applications W/13/01587/OU (124) and W/13/02604/OU (64) which are both permitted subject to S106 agreements in November and July 2014 respectively. The landowner now has major house builders on board in the finalising of the S106 agreements (Barratt and David Wilson). It is likely that these agreements will be signed in the summer 2015. Allowing 12 months for Reserved Matters to be determined and a further 12 months before the developers commence on site completions are only assumed from October 2017 – March 2020. Therefore an average build rate of 40 dwellings per annum per outlet has been assumed. It has been assumed that 100 dwellings can be delivered on W/13/01587/OU (124 dwellings) and all 64 dwellings can be achieved on the smaller site W/13/02604/OU (64dwellings). This means a conservative estimate of 164 dwellings can be achieved from 2017 to 2020. **164 dwellings deliverable in five years**

SWDP50/2 Employment site, Kings Road, Evesham

There are 2 applications relating to two smaller greenfield areas of this larger allocated site which is proposed for 100 dwellings in the submitted SWDP. The first 14/01848/PN for 12 dwellings has been granted permission and has had the S106 completed on 17 April 2015 so is not included in permissions granted but not yet started at 1 April 2015. This site has full permission and has a developer on board. Given the size of the site it is easily deliverable within 5 years.

The second application (15/01014/PN) for 13 dwellings is yet to be determined. Officers have allowed 30 months for permission to be granted and for the first legal completions to take place from October 2017. Again given the size of this application all 13 homes are considered deliverable within 5 years. In total **25 dwellings deliverable in five years**

SWDP59/18 Land west of Leamington Road, Broadway

This site was refused planning permission for an extended site area for 125 dwellings within the AONB, however, this has recently been allowed by the Planning Inspectorate (2 July 2015) 13/00680/PN). The applicant has also submitted an application for a revised scheme of 58 dwellings that has yet to be determined (14/02058/PN). There is strong evidence that the applicant Spitfire Homes are keen to bring the site forward and have an RSL on board to deliver the 50 affordable

homes, both companies have delivered previously in the District. As there is still some uncertainty about which scheme will be delivered the Council is adopting a cautious approach and have only assumed 58 dwellings will be delivered within 5 years (in line with that proposed to the SWDP Inspector), although it is highly likely that all 125 will be delivered. Officers have allowed 30 months for permission to be granted and for the first legal completions to take place from October 2017. 58 dwellings can comfortably be built out within the remaining 2 and half years, as this would only require a build rate of fewer than 25 dwellings per year. **58 dwellings deliverable in five years**

SWDP59/25 The Racks (east) Ombersley

The applicant has submitted a planning application for 34 dwellings that covers the proposed extended SWDP allocation (15/00766/OU). The site is currently proposed as an allocation for 34 in the proposed Modifications to the Submitted Plan. Given the fact there is a current application and the total number of dwellings is relatively low this is easily achievable within five years even after allowing 30 months for the first legal completions on site. **34 dwellings deliverable in five years**

SWDP60/14 Land south of B4084 Drakes Broughton

The site has the benefit of outline planning permission subject to Section 106 agreement for an increased site area for 90 dwellings W/14/01419/OU. The site is currently proposed as an allocation for 50 dwellings in the Submission Plan although in the SWC examination statement it was suggested that this be increased to reflect the planning permission. The developer has indicated in the deliverability questionnaire that they will start on site in November 2015. The applicant still needs to submit Reserved Matters therefore assuming a start in 24 months the developer has 3 years to deliver 90 dwellings. Given the fact it is Bovis homes, a volume house builder, this is easily achievable. **90 dwellings deliverable in five years**

SWDP60/16 Dilmore Lane/Station Road, Fernhill Heath

This site has a current resolution to grant planning permission subject to Section 106 (14/00367/OU) which is in its final stages and is nearing completion. Pre app meetings to submit the Reserved Matters are now underway. Officers have allowed 24 months for Section 106 and reserved matters approval; therefore it has been assumed that the developers (Taylor Wimpey) will commence on site by April 2017. Given they are a volume house builder and there is local evidence that they deliver

between 30 and 70 dwellings per annum on sites in Wychavon they are capable of delivering 120 dwellings in 3 years. **120 dwellings deliverable in five years**

SWDP60/17 Land off Broadway Lane Adjacent Grey Lyn, Fladbury

Full planning permission has been granted on 25 June 2015 for 18 dwellings on this proposed allocation in the SWDP W/14/02400/PN. The site is currently proposed as an allocation for 7 dwellings in the Submitted Plan although in the SWC examination statement it was suggested that this be increased to 18 to reflect the planning permission. Given the small size of the site and the fact it has full permission it is easily deliverable within 5 years. **18 dwellings deliverable in five years**

SWDP61/9 Harrow Lane, Himbleton

The site has a current application by Cala Homes for 8 dwellings that has yet to be determined 14/01692/PN. The site is currently proposed as an allocation for 6 dwellings in the submitted plan. Given the fact there is a current application by a house builder and the total number of dwellings is relatively low this is easily achievable within five years. **6 dwellings deliverable in five years**

SWDP61/15 Land to the rear of Hawthorn Rise Tibberton

The site is proposed for 14 dwellings and a replacement village hall. A current planning application (15/00330/PN) has been submitted by Rooftop for 14 dwellings and a village hall, which has yet to be determined. Allowing 30 months for the scheme to commence still allows over two years for 14 dwellings to be built. Rooftop has a track record of delivering within 12 months of gaining permission therefore the 14 dwellings are easily achievable within 2 years. **14 dwellings deliverable in five years**

Total number of deliverable allocated dwellings* in the submitted SWDP = 529

*within five years

11. Lapse Rate

11.1 The Inspector conducting the SWDP Examination was critical of the way the lapse rate of 4% across the SWDP area was justified. The Inspector recalculated the lapse rate and showed it to be

4.8% and therefore concluded that adopting 5% as an assumption about future rates would be “robust and sound” for the Plan across the three authorities.

11.2 In light of this decision the Council have amended the way the position is calculated to comply with the Inspectors methodology and Appendix 8 provides evidence on lapse rates by site from 2006/07 to 2014/15 in Wychavon District. It should be noted that Wychavon has a considerably lower lapse rate than that of Worcester City and Malvern Hills District, less than half of the 5% average assumed across the three authorities.

11.3 Summing all the ‘lapsed permitted dwellings’ 2006/07 to 2014/15 and dividing that by the total number of dwellings with outstanding planning permissions over the same period, gives an average lapse rate of 2.35%. In keeping with a cautious approach Wychavon has adopted a generous 5% lapse rate making the Council’s position more robust. For full list of lapsed sites see Appendix 8.

A cautious **5 % Lapse rate** has been assumed.

Table 1 Wychavon Planning Permission Lapse Rates 2006-2015

Year of Expiry	Number of Dwellings Expired	Total outstanding Commitments (excludes Local Plan Allocations)	Lapse Rate %
2006/07	17	830	2.00%
2007/08	6	1129	0.50%
2008/09	69	987	7.00%
2009/10	30	947	3.20%
2010/11	80	1355	5.90%
2011/12	37	1864	2.00%
2012/13	14	3127	0.40%
2013/14	57	3403	1.70%
2014/15	125	4869	2.60%
Total over 9 years	435	18511	
Average over 9 year period			2.35%

12. Windfalls

12.1 A windfall² allowance may be justified in the five year supply if a local planning authority has “*compelling evidence*” as set out in [paragraph 48](#) of the National Planning Policy Framework.

12.2 Given the above, the Inspector conducting the Examination into the SWDP confirmed in his Interim Conclusions (October 2013) that, in principle, he saw no objection to the Plan accounting for windfalls as part of the supply of housing over the plan period. Therefore an appropriate allowance has been accounted for in the 5YHLS calculation.

12.3 Appendix 9 contains a detailed breakdown of all windfall completions and concludes that small windfalls (9 or less not Greenfield or garden land) have been delivered at an average rate of 87 dwellings per annum from 2006 to 2015. Therefore the Council has continued to adopt the Inspector’s assumption of 82 dwellings per annum looking forward.

12.4 In order to avoid double counting windfall sites that already have planning permission, three years of windfalls are discounted from the five year calculation. This is consistent with the extremely cautious assumptions set out in the SWDP longer term trajectory. Therefore windfall completions are only assumed for two years from 2018/19 onwards.

A total of **164 windfalls** are added to the five year calculation (i.e. 2 x 82)

12.5 Looking at the future sustained delivery of windfall sites officers have in the longer term trajectory assumed that these sites will reduce over time. At this point in time however, for this five year supply calculation, this is not appropriate. However, to ensure that assumptions are up to date this will be monitored every year and if there is a decline in windfall development we will adjust our subsequent assumptions.

12.6 In looking forward and to ensure the assumptions are as robust as possible officers have also considered other potential factors which may affect windfall delivery including:

² Windfalls are any sites that are not allocated sites in a Local Plan, have not been previously allocated or identified in the Strategic Housing Land Availability Assessment (SHLAA)

- The potential impact of the introduction of CIL - this is at least 9 months off being implemented and in any event in order to pass the examination it will have to be set at a level that will ensure development is viable.
- Any specific new rural exception site initiatives/programmes with funding – this remains a top corporate priority for the Council to deliver affordable housing with Registered Social Landlord partners.
- The empty homes programme - this is ongoing and likely to increase in the future.
- The recent changes to Permitted Development rights in respect of a change of use from B1(office) to residential as well as those that came into effect on 6th April 2014 (from retail and agricultural uses to residential) – the Council has already received notification of a number of proposals.

12.7 There is evidence to suggest a consistent supply of large windfall sites (10+ Dwellings) in the district – with a current average of 47 delivered per annum over the last 9 years. However, in keeping with a cautious approach these **have not** been included in the 5YHLS calculation.

13. Five Year Housing Land Supply Table

Table 2 Wychavon Five Year Housing Land Supply Position at 1 April 2015

Sedgefield Approach		per annum
SWDP Objectively Assessed Need for Housing 2014	9950	415
Completions 2006-2015:	3619	
Undersupply (9 years x 415) - 3619:	116	
5 year target excluding undersupply (5 x 415):	2075	
Target with undersupply added:	2191	
5 year target + 20%	2629	526
5 year target + 5%	2301	460
Planning permissions not started at 1 April 2015: 4449-1691	2758	
Sites carried forward from the Local Plan:	0	
Deliverable allocated sites in the submitted SWDP:	529	
Total deliverable sites not started (3287 - 5% lapse rate):	3123	
Sites with planning permission under construction at 1 April 2015. 420 - 30 at Leedons Park :	390	
Windfalls 82 x 2:	164	
Total Supply	3677	
Balance against +20 %	1048	
Total years housing supply against +20%	6.99	
Balance against +5%	1376	
Total years housing supply against +5%	7.99	

13.1 This table brings together all the elements presented in this report to demonstrate Wychavon District's 5YHLS position for 2015-2020 against the annual housing requirement recommended by the SWDP Inspector (31 March 2014 Inspector's Further Interim Conclusions on the Outstanding Matters Considered at the Reconvened Stage 1 Hearing) and the additional under supply and buffers as at April 2015.

13.2 Wychavon is able to demonstrate that it has 6.99 years housing supply against the objectively assessed need for affordable and market housing which includes the past under supply

and a 20 percent buffer. If a 5 percent buffer is applied the position is more positive with 7.99 years housing supply.

14. Maintaining the Housing Land Supply into 2016

14.1 Looking into the future the 5YHLS position is set to continue to remain positive i.e. more than 5 years and robust. The Council has continued to approve a number of dwellings since April 2015 and there are in excess of 150 dwellings approved subject to S106 that are not accounted for in the 5YHLS calculation as they are not on proposed SWDP allocations. Wychavon have continued to adopt a cautious approach and not relied on this component of supply even though it is highly likely these will be delivered within 5 years.

15. Conclusions

15.1 In accordance with the NPPF (Paragraph 47 second bullet point) the Council have identified and updated a supply of deliverable sites sufficient to provide five years worth of housing against the housing requirements even when an additional buffer of 20 percent is applied.

15.2 A substantial amount of work has been undertaken to ensure that the sites are in accordance with the NPPF footnote 11 and are deliverable. Sites have been assessed to ensure they are available, offer a suitable location for development, are viable and have a realistic prospect that housing will be delivered on the site within five years. Where there is clear evidence that a site will not be delivered within five years it has been discounted, this includes when sites are unviable, where there is no current need for the type of unit, and in the case of some very large sites where the delivery will be phased.

15.3 The Council has not relied entirely on its own judgement and has engaged in additional consultation with developers, land owners and agents on large sites (10 dwellings or more) to understand their intentions. Where stakeholders have not provided evidence then the authority has been able to use knowledge gained from those that have, and from trends experienced in the District to make an informed judgement as to the likely delivery of a site.

15.4 The Council has also instructed a consultant to critically assess the 5YHLS 2015-2020 position and their comments have been incorporated into the document.

15.5 The Council is able to robustly demonstrate in excess of five years housing land supply (6.99-7.99 years) against the objectively assessed need for housing figure of 9950 dwellings as recommended by the SWDP Inspector in his Further Interim Conclusions published on 31 March 2014.