

Matter 3 Statement - The supply and delivery of housing land

Prepared on behalf of Nurton Developments

Representor ID 12697 and 12680

Promoter of sites at Rising Lane, Lapworth and Loes Farm, Warwick



Chave Planning



UNDERSTANDINGDATA

with technical support from

edge analytics

Issue: whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy.

1) What is the up to date situation regarding completions to date in the plan period and what is the residual amount of housing that needs to be delivered?

1. There have been 406 completions in the first two years of the plan period (11/12 and 12/13). Adopting the proposed Local Plan annual requirement of 720 dwellings per annum there is a shortfall of 1,034 dwellings. Added to the remaining 16 year requirement the residual requirement is 12,554.

2) What is the potential total supply of new housing? What is the basis for this figure and is it justified? How much of this would be consistent with policies in the Local Plan? How much would be developable within the plan period? How does total potential supply compare with the planned level of provision?

2. The SHLAA (H009) identifies a potential supply of 12,170 dwellings in the period 2011-2026 from sites that are (potentially) suitable, available and achievable. However this does not reflect maximum potential supply, since the SHLAA assessment excluded many sites put to the Council as part of the Core Strategy "Options for Growth" consultation exercise (May - July 2008) which may potentially be suitable. The SHLAA only included urban and edge of urban sites in the potential supply.

3) What is the estimated total supply in the plan period from:

a) existing planning permissions

3. 3,223 from planning permissions granted up to 31/12/13.

b) other commitments e.g. sites subject to S106

4. Unknown.

c) allocated sites

5. The Council has included a supply of 6,188 dwellings in total from the allocations proposed in the Local Plan.

d) other sites specifically identified e.g. SHLAA

6. The Council has identified 393 dwellings from small urban SHLAA sites. This includes 207 dwellings from 'confidential sites'.

e) windfalls

7. The Council has included a windfall allowance of 2,485 dwellings.

4) What are the assumptions about the scale and timing of supply and rates of delivery from these various sources? Are these realistic? Has there been any discounting of sites with planning permission for example?

8. The Council has identified many proposed brownfield, greenfield and village site allocations as commencing delivery in the 2015/16 monitoring period. There is no evidence supporting the trajectory of whether any of these sites have planning permission or whether there are any planning applications pending consideration for them.
9. It might be possible for smaller sites (i.e. <10 dwellings) to deliver dwellings within the current monitoring year IF there is a planning application pending consideration or planning permission had been granted. However there are only 2 such sites included in the trajectory. The larger sites shown to be delivering dwellings within the current monitoring year (9 sites in total) are indicated to deliver between 10-25 dwellings each this year. It is considered that, unless there is full planning permission in place, conditions discharged and the land is in the hands of the developer, it is highly unlikely that dwellings will be delivered in the current monitoring year as suggested.
10. A discount of 2% has been applied to permissions granted 01/04/2013 to 31/12/13, to take account of potential lapses in planning permission. It is not clear why a discount has not been applied to permissions granted prior to 01/04/2013.
11. It is difficult to accept 207 dwellings from 'confidential sites' as part of the trajectory (and particularly the immediate 5 year supply) since nothing is known about their availability, suitability and achievability.
12. Within the first 4 years of the plan period, the trajectory assumes a leap in annual delivery from 144 homes to 1,037 homes per annum. This seems highly unrealistic.

5) Specifically, is the figure for windfalls realistic and justified?

13. The windfall allowance, at 138 dwellings per annum, accounts for nearly 20% of the annual housing requirement. This seems disproportionately high, compared to planned development, and suggests an over-reliance on unplanned development.

6) What are the potential sources of windfalls? Given that the Local Plan and SHLAA have provided the opportunity to identify specific sites, are windfalls likely to come forward on the scale envisaged? What would be the implications if they didn't?

14. The implications of windfalls not coming forward on the scale envisaged would be to undershoot the Local Plan housing requirement by up to c20%.

7) How has flexibility been provided in terms of the supply of housing? Are there other potential sources of supply?

15. No flexibility has been provided in the supply of housing. The trajectory only seeks to meet the housing requirement set out, not exceed it by any significant margin.

8) Has there been persistent under delivery of housing? In terms of a buffer for a five year supply of housing sites, should this be 5% or 20% in relation to para 47 of the NPPF? How should the level of completions since 2011 be taken into account? What would the requirement be for a five year supply including a buffer?

16. During the first two years of the proposed plan period, there has been significant underperformance in housing delivery. Completions (amounting to 406) have only been at 28% of the requirement for the first 2 years (1,440). Prior to April 2011, completions had not been at the average annual level proposed in the Local Plan since 2005/6, suggesting that the low level of housing delivery in the first 2 years of the plan period was not just a glitch; it had persisted over time. On this basis it is considered that there has been a persistent under delivery of housing and a 20% buffer should be applied. No buffer appears to have been applied to the first 5 years of the housing trajectory by the Council.

17. The requirement for a 5 year housing land supply including a 20% buffer would be:

720 annual requirement x 5 years = 3,600
Plus 1,034 shortfall over first 2 years = 4,634
Plus 20% buffer = 5,561 dwellings.

18. This is based on the 'Sedgefield' method of calculation, which is supported by paragraph 035 of the National Planning Policy Guidance and has been the preferred method in appeal decisions by the Secretary of State since the publication of The Framework.

9) Would the Local Plan realistically provide for a five year supply on adoption? Will a five year supply be maintained?

19. The Council's trajectory illustrates a supply of 4,597 in the first 5 years, which is significantly below the 5 year requirement including a 20% buffer and, furthermore, is highly questionable for the reasons given in the answer to Q4, above. Therefore the Local Plan would not be effective in delivering a 5 year supply of housing.

10) In overall terms would the Local Plan realistically deliver the number of dwellings required over the plan period?

20. In overall terms, it is highly doubtful that the Plan will realistically deliver the number of dwellings required over the plan period, not least because 20% of the requirement is proposed to be met by unplanned development.