

WARWICK DISTRICT LOCAL PLAN EXAMINATION

MATTER 3 : THE SUPPLY AND DELIVERY OF HOUSING LAND

Inspector's Key Issues and Questions in bold text.

Issue

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

Questions

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?

The 5 YHLS calculation 2014 – 19 Update Report dated November 2014 indicates 689 completions for the period April 2011 – November 2014. No information was found on completions between November 2014 – April 2015. The Council should confirm the most up to date position on completions and the residual amount of housing to be delivered.

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?

The Housing Trajectory dated May 2014 sets out the potential total housing land supply as 12,964 dwellings. Whilst the HBF does not comment on the merits or otherwise of individual sites there is concern that but this proposed trajectory does not provide sufficient headroom against a proposed housing requirement of 12,860 especially if this housing requirement is re-assessed upwards as advocated in the HBF Matter 2 Hearing Statement.

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

- a) existing planning permissions**
- b) other commitments e.g. sites subject to S106**
- c) allocated sites**
- d) other sites specifically identified e.g. SHLAA**
- e) windfalls**

The Council estimates its total housing land supply for the plan period as follows :-

SOURCE OF LAND	NUMBER OF DWELLINGS
Completions to 3 / 2013	406
Planning permissions	3223
SHLAA sites	393
Windfall	2485
Regeneration sites	269
Allocated brownfield sites	1330
Allocated greenfield sites	4115
Allocated village sites	743
TOTAL	12,964

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?

As previously stated there is concern about the lack of headroom between the total housing land supply and the proposed housing requirement. There is also a concern that the 5% non-implementation allowance provides only very limited flexibility. It is noted that in the Councils up dated November 2014 5 YHLS calculation 177 dwellings for Care Homes are included in the housing land supply. Further clarification about this source of land is sought from the Council.

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

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?

The windfall allowance of 122 dwellings per annum is significant given the SHLAA work in identifying sites. It is unlikely that such a scale of windfalls will continue in the future.

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

As commented on above there is no flexibility.

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?

In the 5 YHLS calculation the Council uses 5% buffer which is applied to both the annualised housing requirement and the shortfall in housing delivery. As set out in the NPPG the Council is making up shortfalls in the first 5 years. However since the moratorium imposed between 2005 – 2011 housing delivery has been slow to recover. The Council's 5 YHLS calculation shows that since 2011 housing delivery

has fallen below the proposed annualised housing requirement of 714 dwellings per annum. Therefore if under deliver continues to persist the Council may have to re-consider whether or not a 20% buffer would be more appropriate in order *“to provide a realistic prospect of achieving the planned supply and to ensure choice and completion in the market for land”* as required by paragraph 47 of the NPPF.

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

At April 2013 the calculated position of 5 YHLS indicated that the District had a 2.8 year supply of housing land. It was expected that when the position for April 2014 was calculated, the 5 YHLS position within the District would have improved in comparison with April 2013 but the likelihood remained that there would still be a shortfall. By April 2014 the position improved to 3.8 years. In the up-date in November 2014 the 5 YHLS calculation had improved to 4.5 years due to 1,252 planning permission granted and included in the supply. However the Council should provide a further up-date on the 5 YHLS position as of April 2015.

If there is not reasonable certainty that the Council has a 5 YHLS the Local Plan cannot be sound as it would be neither effective not consistent with national policy. Moreover if the Local Plan is not to be out of date on adoption it is critical that the land supply requirement is achieved as under paragraph 49 of the NPPF *“relevant policies for the supply of housing will not be considered up to date if the LPA cannot demonstrate a five year supply of deliverable housing sites”*.

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

The fundamental thrust of Government policy is the need to boost significantly the supply of housing. Under the NPPF the requirement to meet the full objectively assessed needs for market and affordable housing is an absolute one except insofar as there is any inconsistency with other policies set out in the NPPF. The phasing proposal in Policy H10 Bringing forward allocated sites in the growth villages Bullet point (c) states *“on sites allocated for 50 or more dwellings, the proposals include a phasing strategy whereby the homes are delivered across the plan period in phases of no more than 50 dwellings at a time over a period of 5 years, starting from the date the development commences on site”* which will delay the meeting of OAHN in the growth villages. The Council has not demonstrated that its housing needs are less at specific times during the plan period in fact such phasing may worsen trends in market signals such as affordability and rates of development. The proposed phasing set out in Policy H10 should be deleted.

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