

Warwick District Local Plan Examination.

Statement on behalf of Representor 12966; Dr P Thornton and Others.

Matter 3. The Supply and Delivery of Housing Land.

1. In response to modification 8 , my clients considered the rate of delivery from the sites allocated in the Local Plan that are close to the City of Coventry, and therefore best placed to meet a proportion of the City's housing needs. In that context they are therefore of the view that the following comments should be submitted to the Examination, about the supply and delivery of housing land as set out in the trajectory of 2016.

Scale and Timing of Supply and Rates of Delivery.

2. The anticipated rates of delivery from the various sources of housing land supply are set out in the Housing Trajectory Sites for 5 Years- March 2016. I would anticipate that the information in this trajectory will have informed the Update of the Five Years Housing Land Supply at March 2016. I have considered the rates of delivery and the anticipated start dates shown for the sites as recorded in the trajectory.

3. From the representations submitted to Modification 8, it may be appreciated that my clients consider that the proposed sites that are closest to the city and therefore best able to meet the un-met demands for housing from there, are the two village sites at Burton Green and Baginton and the strategic allocations at Kings Hill and Westwood Heath.

4. The start dates and delivery from the sites at Burton Green, Baginton and Westwood Heath, as set out in the trajectory, seem to anticipate that any planning permissions, section 106 agreements and pre development site works/approval of reserved matters will be secured over the next two years. In my view that is a somewhat heroic assumption, notwithstanding that in so far as Westwood Heath is concerned there have been discussions with the developer about delivery from this site.

5. Setting aside the sites close to Coventry it seems to me that there are some further optimistic assumptions about delivery from a number of other allocations. In particular I would highlight Thickthorn in Kenilworth (H06), which assumes delivery of the first homes as soon as 2018/19 and the Crackley Triangle site, where despite a permission in place no start has been made and it is therefore unlikely that the initial tranche of 25 dwellings will come forward from the site in 2016/17 as anticipated.

6. I am therefore of the view that the plan as presently formulated, takes an over optimistic view of delivery from many of the allocated sites presently without permission. It therefore purports to suggest that the plan will redress the shortfalls in provision experienced since 2011 over the next five years. In reality the plan needs to identify and include some additional short term deliverable sites if it is to secure the required level of housing provision over the plan period and begin to redress the above noted shortfall.

Delivery of Housing 2011-2016

7. Paragraph 16 of the Housing Supply Topic Paper, June 2016, records the number of completions on an annual basis in the district 2011-2016. The total number of houses completed was 2040 dwellings, excluding the Care Home bed spaces, as these fall within use Class C2. The highest annual level of completions was 732 dwellings in 2014-15. At no point did housing completions match the required policy rate of provision for 932 dwellings per annum.

8. Over the first five years of the plan there has therefore been a persistent under –delivery of housing. In consequence the 20% buffer should be applied in estimating the requirement for the next five years of the plan.

Will the Local Plan Provide for a Five years Supply on Adoption.

9. This is an appropriate but difficult point to address, since it will require the input of estimated completions up to the date of adoption. The Council have attempted to do this in paragraph 36 of the Housing Supply Topic paper, and have concluded there will be a 5.18 years supply at March 2017.

10. I have a number of concerns with this assessment.

a. Completions 2011-16.

These are recorded as 2040 dwellings in the table at paragraph 16 of the Topic paper. In the assessment at paragraph 36 they are recorded as 2102.

b. Estimated Completions 2016-17

The trajectory estimates these will be 796 dwellings. At paragraph 36 they are recorded as 1157 dwellings.

11. If amendment is made in line with the recorded completions as set out above I estimate the five years supply would be as follows.

Annual Requirement	932 dws
Requirement 2011-17	5592 dws.
Less Completions 2011-16	2040 dws
Less Completions 2016-17	796 dws
Shortfall to 2017	2756 dws
Five years policy requirement 2017-22	4660 dws (932x5)
Sub total	7416 dws (4660+2756)
Plus 20% buffer	8899 dws
Annualised Requirement 2017-22	1779 dws per annum (8899/5=1779)
Total land Supply as estimated by WDC	8694 dws (Table at para 36)
Years Supply	4.8 years.

12. In the above calculation I have adopted the supply set out in the table at paragraph 26 of the Topic paper. If I were to adopt the anticipated supply as set out in the trajectory for March 2016 (Actual and Forecast Completions; Table 1) for 2017-22 this would total 4238 dws and the five years supply would on that basis amount to only 2.38 years.

13. On either basis I must therefore conclude, in response to question (7) that the plan will not provide for a five years forward supply of housing land on adoption in 2017. On the basis of forecast completions set out in the trajectory it would seem to me that it would be beyond 2021 before there would be any prospect of the situation being regularised. The release of more immediately available and deliverable sites is needed over and above the supply set out in the trajectory. In my view the problem would be best addressed by the release of sites in the range between about 10-60 dwellings which would be best placed to achieve full delivery in the five years beyond 2017. The Council should encourage such sites to be brought forward.

Staggering the Annual Housing Requirement.

14. This is an issue my clients have addressed in their response to modification 8. It is considered that until the HMoU was agreed in 2015 that the housing completions in the District from 2011 would for the most part have addressed the needs of the District. Sites were released on the basis of the emerging level of provision in the Publication Draft Plan; 12,860 Dwellings or 714 dwellings per annum. (see policy DS 7). In fact in May 2012 a report to the Council and Executive, setting out the preferred options for growth, stated, in appendix 1 para 6.24 that options for (housing) growth (1) and (2) at 600 dws per annum and 700dws per annum respectively represented "...the most realistic options in terms of meeting the housing and employment needs of the District" (See Appendix 1 to this submission)

15. I acknowledge that part of that level of provision going forward from 2014 was to provide for Coventry's needs; 108 dwellings per annum. That was however a somewhat retrospective assertion given the options considered in 2012. However I remain of the view that the planning permissions granted in order to bring sites forward and recorded as completions 2011/12 to 2014/15 would not have been predicated on a level of policy provision that expressly incorporated either a need for 108 dws per annum or the later 332 dws per annum to help address Coventry's shortfall.

16. If it were the case, for example that some of Coventry's needs were being satisfied via permissions that delivered new homes in the early years of the plan, and in the order of 332 dws per annum, then that would have been then at the expense of satisfying local needs.

17. I therefore remain of the view that the levels of housing provision in the plan should be “staggered” in the following way;

2011-2015. 600 dws per annum (Warwick District OAN) Total. 2400 dws.

2015-2029. 427 dws per annum to meet Coventry’s needs. Total. 5976 dws.

2015-2029. 600 dws per annum. (Warwick Districts OAN) Total 8400 dws

2011-2029 Housing Requirement.16,776 dwellings

18. Going forward from 2015 the Plan should provide (in policy terms) for the provision of 1027 dwellings per annum and a total of 14,462 dwellings 2015-29.

19. From 2011 to 2015 the retrospective policy requirement is 2424 dwellings which compares with the 1483 completions over that period; a shortfall of 941 dws.

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2 Projected Employment Growth	1,186	0.9%	716	1.2%	593	0.9%
3 Projected Employment Growth (With Continued Commuting)	853	0.6%	569	0.9%	395	0.6%

Source: Warwick SHMA Figure 2.21

- 6.22. The implications of these three projections for levels of housing growth over the plan period (2011 – 2029) are as follows:

TABLE 7.2 Implications of Projections for Housing Growth

Projection	Dwellings	
	Per annum	Total 2011-2029
1 Trend Based	596	10,728
2 Projected Employment Growth	716	12,888
3 Projected Employment Growth (With Continued Commuting)	569	10,242

- 6.23. The Council published an up-dated version of the Strategic Housing Land Availability Assessment (SHLAA) in May 2012. This identifies potentially suitable housing sites within and on the edge of built up areas. Taken together, these sites would be able to accommodate an estimated 11,410 new homes. In addition, it is estimated that further windfall sites could come forward during the plan period and that these could accommodate around 2,300 new homes between 2011 and 2029.

6.24. What are the Options?

- 6.25. Of the three realistic projections outlined in the SHMA and in Table 7.1 above, the Council dismissed Projection 3 on the grounds that the increase in jobs would not be matched by an increase in homes. Projections 1 and 2, therefore, were considered to be the most realistic options in terms of meeting the housing and employment needs of the District.

Option 1: 600 new homes each year (2011-2029)

Option 2: 700 new homes each year (2011-2029)

- 6.26. Testing of the two options within the Sustainability Appraisal framework showed that Option 2 would be better able to support the projected growth in jobs whereas Option 1 would create better opportunities to protect and enhance the natural and built environment and maintain and improve the quality of air, water and soils. Option 1 was also considered to be a better option in terms of enabling a better range of transport options since new development was likely to better related to the towns.