



Gladman Developments Ltd (9149)

Warwick Local Plan Examination – Further Hearings

Matter 3: The supply and delivery of housing land

- 1) Taking the Council’s latest Housing Trajectory (June 2016) what is the estimated total supply of new housing in the plan period 2011-2029? How does this compare with the planned level of provision of 932 dwellings per annum?**

- 1 The June 2016 topic paper confirms in paragraph 32 that the total supply of housing through all sources is 17,991. This represents a 1,215 surplus over the plan target of 16,766 new homes, a buffer of 7%. Gladman would contend that this figure could potentially lead to the plan coming into difficulty in delivering its overall plan targets.
- 2 In this regard GDL would note in this regard the findings in the Inspectors report into the Stratford-on-Avon Core Strategy, published in June 2016¹. In that report, at paragraph 71, the Inspector finds that to ensure the plan is positively prepared in line with the NPPF the 10% reserve for housing sites should be increased to 20%. Similarly the emerging plan for Redcar and Cleveland, published in May 2016, at policy H1 also considers a buffer of an additional 20% of housing land on top of requirement to be needed in order to:-

"..promote a continuous supply of housing land in line with national policy, and to reduce the risk of under-delivery..."

¹<https://www.stratford.gov.uk/files/seealsodocs/171974/Inspectors%20Final%20Report%20-%20June%202016.pdf> Retrieved 02/08/16

3 Gladman therefore consider that the Council may wish to consider allocating additional sites and/or expanding existing allocations in order to ensure that the plan target can be robustly delivered.

2) What is the estimated total supply in the plan period from a) completions since 2011 b) existing planning commitments c) other commitments e.g. sites subject to S106 d) proposed site allocations e) other sources specifically identified f) windfalls

3 The figures are set out in the June 2016 document, through a series of tables.

3) 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?

5 The Housing Topic Paper confirms in paragraph 34 that information from site promoters has been considered when drawing up the site trajectory contained within Appendix 3 of the document. However, the report does not detail what exactly these findings are, and as a consequence, it is extremely challenging to review the robustness of the trajectory as set out within the document.

6 Gladman would expect the trajectory to be accompanied with information explaining clearly the lead in times proposed for major and strategic sites. This should include but not necessarily be limited to, time to determine planning applications, time to negotiate and sign Section 106 agreement, time to dispose of land (if needed), reserved matters applications, discharge of conditions, site remediation and preparation and construction. Our own development experience has indicated that these issues can take significant periods of time to complete, often taking 12-24 months even from approval of an outline planning application.

7 Furthermore, Gladman note that the delivery of units on individual sites can often be dependent on the number of outlets operating at any one time, this again is especially true for major strategic sites. The current information provided by the Council does not give information as to the number of housebuilders currently proposed to be operating at the same time to justify the figures proposed. It is also noted that the Council confirm that the evidence is that provided by the site promoters themselves, whilst this is a sensible starting point for consideration these figures should be sense checked by the Council and consideration given to their realism. Gladman would note the recommendations of the Local Plan Expert Group (LPEG). In Appendix 13 to the LPEG report a sections considers build out rates and lead in times, it make clear in this section that:-

"Pas tend to use assumptions provided to them by the developers of the site, as the PPG suggests. However, this information can satisfy the best interests of the

developer and is not always realistic, and the PPG should conform that evidence on likely timescales drawn from experience on comparable sites may be highly relevant.²²

8 Gladman do not therefore consider that the current approach to assessing site delivery has been sufficiently evidenced by the Council, for this reason Gladman have undertaken our own assessment of the trajectory and concluded that the likelihood of the plan achieving a 5 year land supply is remote. In order to calculate the trajectory we have applied the following presumptions.

- a. 35 dpa for sites with 1 outlet operating
- b. 60 dpa for 2 outlets,
- c. 80 dpa for 3 outlets,
- d. 100 dpa for 4 outlets;
- e. From grant of outline application to signing of S106 - 6-12 months (depending on site size)
- f. Preparation of reserve matters - 6 months
- g. Determination of reserve matters - 4 months
- h. Discharge of pre commencement conditions - 2 months
- i. Initial on site infrastructure - 3 months
- j. Time for first dwelling to be completed - 6 months

9 The conclusions to the Gladman assessment of housing land supply are considered in response to question 7 below.

10 The Housing Topic Paper suggests that discounting has only occurred on the small SHLAA sites which are identified, but not allocated within the plan. No discounting is proposed for existing commitments, the consolidated employment sites or allocations, Gladman do not consider this a sound approach. As we have discussed in relation to question 1 above, the plan contains little in the way of flexibility, currently there is little headroom, and what headroom there is, is calculated on the presumption that 100% of all allocations, planning permissions etc. will be

²² LPEG Appendix 13 – Section 8 – Land Supply

delivered within the plan period. The margin for error is small, and puts at risk the delivery of the plan.

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

11 As Gladman have pointed out with respect to our answer on question 1 we consider that there is limited flexibility in the supply of housing land when considered against the overall plan target, and that subsequently such an approach does leave the Council in a fragile position. In our Matter 4 and Matter 7(d) statements we have also highlighted where we consider there have been missed opportunities in assessing the development potential and growth options for Warwick. In particular we make reference to none Green Belt sites within the Growth Villages, we have submitted further representations with regard to site H47 Wasperton Farm, Barford and consider that an expanded allocation on this sustainable site could not only help with overall plan targets but will help remedy the deficiencies of the plan with regard to 5 year housing land supply.

12 Further detail on our site submission with regard to Wasperton Farm is contained within our Matter 7(d) statement.

5) 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?

13 Gladman agree with the Council that there has been a persistent under delivery of housing and that the use of a 20% buffer is appropriate. This reflects the interim conclusions of the Inspector in 2015, and is not considered that there has been a material change in circumstances following the interim conclusions to allow for a different conclusion to be arrived at. The latest monitoring return for 2015/16 again shows that net completions have fallen short of the housing target of 932 per annum.

14 The shortfall in housing, which has accrued since the start of the plan period in 2011 should be made up using the Sedgefield methodology i.e. within the first 5 years. This approach is in accordance with the PPG³. Gladman would therefore support the Councils approach to making

³ PPG - Paragraph: 035 Reference ID: 3-035-20140306

up the shortfall using this approach, as they outline in paragraph 36 of the Housing Supply Topic Paper (June 2016).

- 15 When assessing the requirement for the 5 year land supply it is necessary to consider first the Council's choice of preferred date. The Council chooses to base its calculation on a date starting 2017/2018, rather than 2016/17. The difficulty in such an approach is that monitoring data for the period 2016/17 is not known, and will not be known presumably for a period of at least 6 months. It is noted that the Council have estimated a supply figure, but this figure is exactly that, an estimate, the exact figure remains unknown. Reliable completion data is rarely available part way through a monitoring year. Furthermore there is no evidence as to how other factors in the supply may have been altered, for example any loss of housing stock, the expiration of planning permissions etc.
- 16 Gladman would contend it would be more accurate to base the calculation on a time period for which complete data is available, thus whilst we provide calculations using both starting points our strong preference is to use 2016/17 as the first year of the 5 year land supply calculation. It is easy to see why the Council has chosen the 2017/18 base date, the plan cannot demonstrate a 5 year land supply with the start date of 2016/17 using even all of the Council's assumptions.
- 17 The five year requirement is therefore 8,662 for 2016/17 and from 2017/18 would be 8,392, however as discussed Gladman believe the use of the latter figure is problematic.
- 6) Should the annual housing requirement figure be staggered to reflect the need for additional site allocations to meet unmet needs in Coventry and realistic lead in times (see Appendix 4 to the Council's Housing Supply Topic Paper June 2016) i.e. a lower figure in the early years of the plan period, increasing later? If so what would be a reasonable basis for the annual figure? Should the early years be based on OAN for Warwick? How would this affect the requirement for a five year supply?**
- 18 The methodology proposed in Appendix 4 of the plan makes a minimal difference to the 5 year land supply calculation, as assessed by the Council, and would still not justify a 5 year housing land supply position using our assessment of the likely delivery rates and lead in times for many of the major strategic sites. Any back loading of a strategy does risk the delay in delivering much needed housing development within the district and housing market area as a whole. Furthermore, it is entirely possible that there is additional unmet housing needs arising from both Coventry and in particular Birmingham, which will have to be accommodated in the later parts of the plan period. Delaying the delivery of housing, when there are reasonable, sustainably and appropriate solutions to the problem now is therefore an unjustified approach. Gladman have contended that there is a need in any event to provide an additional buffer of

sites to ensure overall plan deliverability, these sites could also contribute to, and deliver a robust 5 year land supply.

- 19 Gladman can see no justification for adopting a stepped trajectory purely to manufacture a 5 year housing land supply. The housing needs of both Coventry and Warwick are apparent, and in the case of those in Warwick have been suppressed for some years, continuing to do so would therefore be entirely contrary to the NPPF and the government's desire to boost house building and to address the housing crisis.

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

- 20 No, Gladman have undertaken a calculation using the Councils methodology in the main document and including the alternative proposal in Appendix 4. The base date for calculations has also been undertaken using both the 2016/17 start date and the 2017/18 base date. It is our view that the base date for calculations should be 2016/17, not 2017/18, changing a base date and including estimates or part completion can be a challenging exercise. Nevertheless we have undertaken calculations to consider both eventualities.

- 21 The calculations are carried out on the currently proposed Local Plan figures, should discussions regarding the overall OAN for Warwick change the figures will clearly require alteration. There is no disagreement that the Sedgefield methodology should be use, or that the authority require a 20% buffer for persistent under delivery. The main contention relates to the delivery rates of some of the strategic sites and the lead in times for the development of those sites.

- 22 Gladman have discounted a total of 298 units from the committed sites from the 5 year land supply with a base date of 2016/17 and 282 units from the base date 2017/18. This has come

from the following sources, all discounting has been undertaken in line with the principles set out in paragraph 8. The Information is contained in Table 1 below.

Table 1 - Discounted sites from current commitments

Site Name	Discount 16/17 Trajectory Start	Discount 17/18 Trajectory Start	Reasons
Myton Road & Europa Way	46	98	Reduction in max 1 year delivery rates to 100 units
The Asps, Banbury Lane	50	50	Reduction in delivery for first year due to anticipated start date
Land south of Gallows Hill	73	88	Changes to reflect anticipated start date and number of developers
Land at Lower Heathcote Farm (W/15/1862)	50	0	Pushed back start date for site delivery
Land at Lower Heathcote Farm (W/15/1473)	56	11	Pushed back start date for site delivery
Grove Farm, Harbury Lane	20	35	Reduced built out rates due to anticipated number of developers
Sydenham Industrial Estate	3	0	Pushed back start date for site delivery

Student Accommodation and C2 Uses

- 23 Gladman have discounted the 237 units of student accommodation contained on a range of committed sites, the Council's approach to incorporating student accommodation into the housing land supply is noted, but contested, as is the approach taken to C2 uses. We would

note that this is an issue discussed at length in the Asps appeal⁴, we would particularly point towards the Inspectors conclusions in paragraphs 14.16 and 14.17 that

"Whilst the Council includes an allowance for student accommodation in the supply, it would appear that the student accommodation need has not been considered specially In the SHMA. Neither was there anything substantive to justify the Councils approach in terms of the amount of accommodation such provision might release onto the housing market. Like the C2 accommodation above, I am not persuaded that it would be appropriate to count such accommodation on one of the balance and not the other."

- 24 In addition, therefore, to the reduction of student accommodation referenced above a further 352 units included within the current trajectory which can be identified as C2 have been removed. A total of 589 additional units should therefore be removed from the supply with regard to C2 and student uses.
- 25 The current 5 year land supply shows a number of commitments from April to May 2016. The inclusion of sites beyond the base date of the supply calculation, or including part data from other years is problematic. As Gladman have already discussed shifting base dates can lead to the inclusion of Incomplete and Inaccurate date, especially with regard to planning applications. For example we do not know if any applications approved in April and May 2016 have expired and should be deducted. Gladman therefore consider that the dwellings in this category should

⁴ APP/T3725/A/14/2221613

be discounted. It is concluded therefore that for the purpose of both base date calculations 225 units should be removed.

26 The total proposed deductions are therefore shown below for each calculation.

Table 2 - Gladman deductions

Category	2016/17-2020/21 Discount	2017/18-2021/22 Discount
Commitments	298	282
C2 and Student	589	589
Commitments April – May 16	225	225
Total	1,112	1,096

27 Gladman would note that there has not been a detailed assessment undertaken of the other aspects of the supply, and that a lapse rate has not been applied by the Council to many of the site categories included within the supply.

28 Gladman conclude that the plan at present will currently provide for between 4.02 using our preferred base date of 2016/17 and 4.53 years supply using the Councils preferred base date of 2017/18. It is noted that even using the Councils own data if the base date was as Gladman contend 2016/17 the supply position would only be 4.66 years. There is therefore an urgent need to identify additional 5 year land supply capacity in order to make the plan sound.

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

29 Gladman have concerns that given that the Council is only seeking to over allocate its housing requirement by a small margin the plan is at risk of failing to deliver its overall targets. There is also a remaining question about unmet housing need within the housing market area, given the failure of Nuneaton and Bedworth District Council to commit to meeting the unmet needs of Coventry. The issue of Birmingham’s unmet housing need, which is substantial, is also likely to be a pressing issue within the early parts of the plan period, the plan as currently written,

cannot easily respond to these changes and the potential requirement to meet those unmet needs.

- 30 It is noted that the plan contains an early review under policy DS20, however this should not be seen as the only way to remedy the issues discussed above. Plan reviews will not respond to issues in a timely manner, especially when there is more the Council could do now to identify and allocated additional sustainable sites to meet housing need. This is part of the reason that the Stratford upon Avon Inspector required a 20% buffer of reserve sites within that plan.