

## Matter 3: The supply and delivery of housing, Bellway Homes West Midlands Represented by Hunter Page Planning Respondent No. 12981 / 1373

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### Matter 3: Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy.

#### Policy DS7 and Housing Trajectory

#### Response to Inspector's Questions

1.1 We have not commented on questions 1-4 in detail and reserve the right to address points raised on housing trajectory in due course subject to the Council's statement and justification on this matter and those of other respondents. In reviewing the Council's latest Housing Trajectory it appears that suitable provision has been made to meet their annual housing requirement and the total supply across the plan period. However, they also demonstrate that the supply is likely to only marginally exceed the 5 year requirement (by 302 dwellings estimated). In light of this, it is suggested that further flexibility needs to be built into the overall housing supply in order to ensure that total supply is met over the plan period. At present, should any of the large allocations not come forward as envisaged the marginal increase in the 5 year requirement that has been suggested could easily be undermined.

#### Under delivery – response to question 5

- 1.2 There has been a persistent under delivery of housing and this is acknowledged by the Inspector in his letter (Exam 23) and referenced in the Council's 'Distribution of Development' document HO25.
- 1.3 It is considered that the housing supply for the local plan area is artificially constrained by the Green Belt. Nevertheless, paragraph 47 of the NPPF requires LPAs to 'identify and update annually a supply of specific **'deliverable' sites sufficient to provide five years worth of housing against their housing requirements.'** However, due to the limited supply of sites within the main urban areas and the Green Belt constraints, the Council are heavily reliant on strategic allocations to deliver the bulk of housing across the plan period.
- 1.3 Clearly, there is a need for the strategic allocations to deliver within the plan period in order to address the housing requirements. However, the reliance on these allocations to deliver in the early phases of the local plan programme (i.e. first five years) is unrealistic due to the long lead in times of these developments associated with the infrastructure works.

1.4 Whilst the NPPF encourages LPAs to be aspirational and boost housing supply, the sites need to meet the three deliverability criteria (available, suitable and achievable) in order to be considered eligible for the first five years supply. It is apparent that the Council are struggling to demonstrate a realistic five year housing land supply.

1.5 As there has been persistent under delivery of housing in this case a 20% buffer should be applied.

#### Should the annual housing requirement be staggered – response to question 6

1.6 Due to persistent under delivery of housing, the annual housing requirement figure should not be staggered. There is a need to make up for the shortfall in housing supply and therefore delivering housing as quickly as possible should be a priority in order to be NPPF compliant. In terms of housing supply, the Council should be embracing the NPPF and using the Local Plan as an opportunity to stimulate growth and boost the supply of new housing.

#### Will the local plan provide for a five year supply on adoption – response to question 7

1.7 The Council are confident that they will provide a five year housing land supply on adoption and have set out within their housing topic paper (HO25). It is considered that the Council do have the opportunity of meeting their 5 year supply providing the development of site is not staggered. If some of the larger sites identified for development are not delivering the level of housing envisaged within a 5 year period other sites should be advanced to maintain a 5 year supply.

#### Will the plan deliver the number of dwellings required – response to question 8

1.8 As the Council have accommodated the recommendations made by the Inspector and have increased their housing requirement across the plan period, there is every opportunity to meet the required housing provision.

