

# **Warwick District Council**

## **Local Plan Examination**

### **Response to Inspector's Initial Matter and Issues**

#### **Matter 3**

#### **The supply and delivery of housing land**

##### **Issue**

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

**August 2016**

## Policy DS7 and Housing Trajectory

### Questions

**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?**

- a) The total supply set out in appendix 1 of the Housing Topic Paper - June 2016 (HO27PM) is 17,991 dwellings.
- b) This exceeds the planned level of provision of 16,776 dwellings by 1,215 dwellings or 7.24%.

**2) What is the estimated total supply in the plan period from**

- a) **Completions since 2011:** 2,102 dwellings (HO27PM - Appendix 1a)
- b) **Existing planning permissions:** 7,270 dwellings (HO27PM - Appendices 1c and 1j)
- c) **Other commitments e.g. sites subject to S106:** None
- d) **Proposed site allocations (submitted Plan and Council's suggested modifications):** 7,175 dwellings made up from the following parts of (HO27PM - Appendix 1)
  - i) Brownfield Allocations: 930 (HO27PM - Appendix 1f)
  - ii) Greenfield Allocations: 1,680 (HO27PM - Appendix 1g)
  - iii) Village Allocations: 1,100 (HO27PM - Appendix 1h)
  - iv) New Site Allocations June 2016: 3,465 (HO27PM - Appendix 1i)
- e) **Other sources specifically identified:**
  - i) 200 dwellings – Canalside and employment regeneration areas (HO27PM - Appendix 1e)
  - ii) 262 dwellings – small urban SHLAA sites (HO27PM - Appendix 1c)
- f) **Windfalls:** 982 dwellings (HO27PM - Appendix 1d)

**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?**

- a) **Completions since 2011:** The table at paragraph 16 of the Housing Supply Topic Paper - June 2016 (HO27PM) sets out the latest position regarding housing completions since 1<sup>st</sup> April 2011. The approach taken takes account of paragraph 38 of the Inspector's Letter to the Council of 1<sup>st</sup> June 2015 (EXAM 23). It should be noted that the level of completions for 2014/15 is significantly higher than had been indicated in the Council's Matter 3 Statement of April 2015 (732 dwellings instead of 491). This is because the monitoring which informed the April 2015 statement had been undertaken in February prior to the end of the monitoring year.
- b) **Existing planning permissions:** Appendix 1b of the Housing Supply Topic Paper - June 2016 (HO27PM) sets out all the sites with outstanding planning permissions. Paragraph 19

explains more regarding the reasons why the total number of planning permissions is significantly higher than the position set out in Policy DS7 of the Local Plan. The key factor is that a significant number of allocated sites outside the Green Belt have now received planning permission. Where these permissions for allocated sites were granted prior to 1<sup>st</sup> April 2016, the housing numbers are included in the commitments rather than in the allocations. The total number of permissions does also include three sites that were granted permission in April and May 2016 but which were not as allocated.

- c) **Other commitments e.g. sites subject to S106:** the Council is rigorous in ensuring Section 106 agreements are prepared and signed within statutory timeframes and at the time of preparing this Statement, there are no planning permissions included within the “commitments” that are subject to Section 106 agreements.
- d) **Proposed site allocations (submitted Plan and Council’s suggested modifications):** the proposed allocations are set out in the Housing Supply Topic Paper - June 2016 (HO27PM) appendices as follows:
- Appendix 1f (Brownfield sites – submission draft)
  - Appendix 1g (Greenfield sites – submission draft)
  - Appendix 1h (Village sites – submission and modifications)
  - Appendix 1i (New allocated sites – modifications)

The housing numbers set against each of these sites are based on the following:

- i) Where planning permission has been granted prior to 1<sup>st</sup> April 2016, these are included in commitments. Therefore no housing numbers are included against these allocations.
- ii) The site capacity for each allocation has been calculated on a site by site basis based on site size, location and constraints. In considering site capacity, the Council has had regard to representations.
- iii) Unless constraints or other factors indicate otherwise, the following general approach has been applied to site capacity.
  - Gross to net developable area: depending on the amount of infrastructure required gross to net reduction to the site area has been applied within the range 0.50 or 0.75. In general 0.5 has been applied to strategic greenfield sites and 0.66 has been applied to edge of village sites and most brownfield sites. Where appropriate variations have been made from this approach.
  - Housing density: in general a housing density of 35 dwellings per hectare has been applied to greenfield sites and a density of 50 dwellings per hectares has been applied to urban brownfield sites. Where appropriate variations have been made from this approach.
- iv) All housing numbers for allocated sites are estimates. The Council does not expect developments to adhere to the numbers set out in the Plan. Therefore if, during the planning application process, the evidence points to a different number, this could be supported. It is therefore possible that sites will deliver higher housing numbers than set out in the estimates.

e) **Other sources specifically identified:**

- i) Small Urban SHLAA Sites: the Council has identified the potential for 14 small urban SHLAA sites to deliver up to 291 dwellings. Further detail regarding this source of supply is set out in paragraph 21 (pages 7 and 8) of the Housing Supply Topic Paper - June 2016 (HO27PM). The source of supply is justified because on the one hand the Local Plan does not allocate sites under 50 dwellings in urban areas and on the other hand, the windfalls allowance (see f below) does not include sites over five dwellings. These 14 sites all have capacity for between five and 50 dwellings and have been specifically put forward by owners as part of the SHLAA. Each site has been subject to an assessment to ensure it is suitable and deliverable, although a 10% deduction has been applied to take account of the possibility that one or more of the sites do not come forward. As a result, the Local Plan includes 262 dwellings from small urban SHLAA sites.
- ii) Canalside and employment land regeneration: the Council has identified the potential to deliver around 200 dwellings within some of the District's traditional industrial estates where high levels of vacancies have been identified in the Employment Land Review Update 2013 (EC03). Further detail regarding this source of supply is set out in paragraph 22 (page 8) of the Housing Supply Topic Paper - June 2016 (HO27PM).

- f) **Windfalls**: Paragraph 20 (page 7) of the Housing Supply Topic Paper - June 2016 (HO27PM) summarises the Council's approach to making an allowance for windfall sites within the Local Plan. Full details of the Council's approach are set out in the Assessment of Windfall Allowance, June 2016 (HO29PM). As explained in paragraph 20 of HO27PM, in revising its approach to the windfalls allowance, the Council has taken account of the contents of the Inspector's letter of 1<sup>st</sup> June 2015 (EXAM 23).

The emerging data for 2016/17 provides evidence to further support the Council's approach to a windfalls allowance. During the first four months (April to July) of the year, 22 dwellings have been added to the supply through conversions, ten on sites of less than five dwellings in urban areas and 17 in rural areas, giving a total of 49 dwellings. This compares to an annual estimate of 98 dwellings from these sources for the remainder of the Plan period. As a result, the Council considers that the revised approach to windfalls remains justified and realistic.

- g) **Has there been any discounting of sites with planning permission for example?** With the exception of Small Urban SHLAA sites (see e (i) above) there has been no discounting for non-implementation. In a district with strong viability and a vibrant economy it is not considered appropriate to apply discounts when viewed over the whole Plan Period. In justifying this, the Council has taken account of the following factors:

- i) In terms of sites with planning permission, expiries are generally at a low level in the District. Appendix A of this Matter 3 statement shows that that during the Plan period, taking the number of dwellings that have expired as a percentage of dwellings granted planning permission, only 4.17% of dwellings with permission have expired, and over a longer period since 1999/2000 it is slightly higher at 4.69% but still less than 5%. This reflects the strong viability for development across the district and the fact that, in general, planning permissions that are granted are delivered. Whilst there are

exceptions to this which lead to expiries, in most cases these sites are recycled back in to the supply with revised proposals that are ultimately delivered. To take two examples during 2015, firstly the permission for 110 units at the Police Headquarters, Leek Wootton expired, but deliverable proposals are now included within the Local Plan allocations to replace the expired permission. Secondly permission for 16 units at Warwick Printers, Theatre Street has been superseded by a much more comprehensive scheme for 39 units granted in 2015/16.

- ii) Of the total of 7,098 commitments, the 2015/16 monitoring showed that 2,861 units remain to be completed on sites that have some completions recorded. Further, since the 2015/16 monitoring was undertaken a number of sites have commenced (for instance Opus 40, North of Oakley Wood Road, Lower Heathcote Farm, Sydenham Industrial Estate, Harbury Gardens, Woodside Farm Phase 2 etc.). In total these sites that have started more recently include 1,535 units still to be completed. So in total 4,396 units are still to be completed on sites that are under construction. These sites clearly do not require a discount as the permission is implemented and delivery is already underway. A total of only 2,702 dwellings therefore remain on sites that have not started. If a 5% discount was applied to these it would result in a total discount of 135 dwellings. However, it should also be noted that of the 2,702 dwellings on sites still to be started, 2,075 are on sites that are also allocated. If these are excluded, only 627 dwellings are on sites that have planning permission but are not started or are not allocated in the Plan. A 5% discount of this is only 31 dwellings. It is the Council's view that applying a discount in this way is an unnecessarily complex approach to take to providing flexibility and that the level of flexibility already included in the overall supply can accommodate the risks that a small number of dwellings could expire. In summary, the evidence does not support the need for a discount for sites with planning permission.
- iii) In terms of allocations, detailed work has been carried out to assess the suitability deliverability and viability of sites. In addition the District's strong track record of delivery of allocated sites, the evidence set out in Matter 7 suggests that there is a strong likelihood that the allocated sites will be delivered. However, in the event that a small number are not delivered, the Plan includes a substantial level of flexibility (of 1,215 dwellings). This has been incorporated to ensure that the risks associated with sites not delivering as anticipated are reduced and that the Plan is sufficiently resilient to withstand this. In this context there is no evidence support discounting of allocated sites.

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

- a) Flexibility is provided predominantly through providing for a supply of housing that exceeds the requirement by 1,215 dwellings or 7.24%.
- b) In addition, the Council would anticipate that some additional supply is achieved from urban windfalls sites for redevelopment / new build of five or more dwellings. The evidence provided in Table 1 at paragraph 4.8 of the Council's revised Windfalls Allowance Paper – June 2016 (HO29PM) shows that this has been a consistent source of supply, including over the last five years providing a total of 877 completions over this period. Whilst the Council considers that this source of supply will reduce as the allocated sites come on stream and

cannot therefore be relied upon as a component of the published housing land supply, there is a strong possibility that this source will continue to add to the supply on an ongoing basis. This possibility is supported by evidence which shows that:

- i) Even during the period that the allocations from earlier Local Plans were being built out in the early-to-mid years of the last decade, this source continued to contribute significantly to the supply (Table 1 of HO29PM).
- ii) 24 dwellings in this category have received planning permission during the first four months of 2016/17. If extrapolated this would equate to 72 dwellings granted per annum and if this trend continued, would equate to an additional 504 dwellings for the final seven years of the plan period. It is acknowledged that this evidence is based on planning permissions not completions and that there is potential for overlap with small urban SHLAA sites and canalside and employment regeneration areas.

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?**

a) Completion rates have improved substantially in 2014/15 and 2015/16 (Appendix 1 of the Housing Topic Paper - June 2016 (HO27PM)). However, this has not been of sufficient scale to achieve the annual requirement of 932 dpa. In this context there has been persistent under-delivery relative to the *requirement* i.e. the supply of houses that is required to meet the district's OAN and help to meet the needs of Coventry. On that basis a 20% buffer should be applied when the Plan is adopted.

b) This gives a five-year requirement (as set out in para 36 of HO27PM) as follows:

<b>THE FIVE YEAR REQUIREMENT AT 31ST MARCH 2017</b>	
	<b>Dwellings</b>
Annual Requirement	932
Requirement 01/04/2011 to 31/03/2017 (6yrs x 932)	5592
Less completions 01/04/11 to 31/03/16	-2102
Less estimated completions 1/04/16 to 31/03/17	-1157
<b>Sub Total (shortfall since 2011)</b>	<b>2333</b>
Five Year Requirement 01/04/2017 to 31/03/2022 (5yrs x 932)	+4660
<b>Sub Total</b>	<b>6993</b>
Plus 20% Buffer	+1399
<b>Five Year Requirement 1/4/17 - 31/03/22</b>	<b>8392</b>

c) The Council has considered an alternative method for taking account of the level of completions since 2011. This relates to the staggered approach is set out in 6c) below. It applies the District's Objectively Assessed Need to the first five years of the Plan period and

thereafter applies a higher annual housing requirement to take account of Coventry's need. Whilst this approach is not preferred by the Council for the reasons set out in 6a below, it does have some benefits and to assist the Examination, the Council has prepared an alternative proposal set out in Appendix B of this Statement.

- d) As shown in the table below, the District's Objectively Assessed Housing Need (i.e. excluding any contribution towards Coventry's needs) has been achieved in each of the last two years. In this context, it would be reasonable to argue that there has not been persistent under delivery (particularly if the factors set out in in para 8.7.and 8.8 of the Council's Matter 3 Statement from April 2015 are also taken into account) and that a 5% buffer should be applied in this alternative approach.

<b>Housing Delivery in Warwick District 2011/12 to 2015/16</b>			
<b>Year</b>	<b>Completions</b>	<b>Comparison with OAN (600dpa)</b>	<b>Comparison with Modifications Housing Requirement (932dpa)</b>
2011/12	144	-456	-788
2012/13	262	-338	-670
2013/14	345*	-255	-587
2014/15	732	+132	-200
2015/16	619	+19	-313
<b>Total</b>	<b>2102</b>	<b>-898</b>	<b>-2558</b>

\*includes 62 care homes bedspaces completed between 1/4/11 and 31/3/14

- e) In these circumstances, the five-year requirement would be as follows:

<b>ALTERNATIVE FIVE YEAR REQUIREMENT AT 31ST MARCH 2017</b>	
	<b>Dwellings</b>
Annual Requirement 1/4/11 to 31/3/17 (6yrs)	600
Annual Requirement 1/4/17 to 31/3/29 (12yrs)	1098
Requirement 01/04/2011 to 31/03/2017 (6yrs x 600)	3600
Less completions 01/04/11 to 31/03/16	-2102
Less estimated completions 1/04/16 to 31/03/17	-1157
<b>Sub Total (shortfall since 2011)</b>	<b>341</b>
Five Year Requirement 01/04/2017 to 31/03/2022 (5yrs x 1098)	+5490
<b>Sub Total</b>	<b>5831</b>
Plus 5% Buffer	+292
<b>Five Year Requirement 1/4/17 - 31/03/22</b>	<b>6123</b>

- f) The above table is offered only as an alternative, but if adopted would provide for 7.1 year land supply on adoption.

**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 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 figures? Should the early years be based on OAN for Warwick? How would this affect the requirement for a five year supply?**

- a) The Council appreciates the potential advantages of a staggered approach to the delivery of housing land. However, it proposes to maintain the approach that is set out in paragraphs 33 to 38 of the Council's Housing Supply Topic Paper - June 2016 (HO27PM) for the following reasons:
- i) It is clear, simple and robust and seeks to boost significantly the supply of housing
  - ii) Along with paragraph 47, paragraph 50 of the NPPF requires a choice of sites. The range of sites that has been identified in different locations satisfies that objective.
  - iii) Linked to this, paragraphs 54 and 55 of the NPPF seek to ensure that local needs in rural areas are reflected and that proposals support the vitality of rural communities. The allocation of a range of smaller sites in predominantly rural locations helps to achieve this. By allocating both larger strategic and smaller sites, the Local Plan seeks to provide opportunities for different types of housebuilders including more local builders. This not only enables choice, competition and delivery, but also has the potential to bring local economic benefits.
  - iv) The approach accords with the framework provided by the Council's spatial strategy.
- b) However paragraph 37b of the Housing Supply Topic Paper (HO27PM) sets out a number of factors that have made it particularly challenging to meet the full Local Plan housing requirement to date. These factors are:
- i) Environmental constraints limiting the availability of sites outside the Green Belt
  - ii) Green Belt constraints meaning that a significant part of the potential supply is not available until after the adoption of the Plan and cannot be advanced through applications for planning permission
  - iii) Lack of clarity about the extent of Coventry's unmet need until 2015 affecting lead in times for the allocations proposed in the modifications

In addition, the Council's approach to releasing Green Belt sites (particularly adjacent to the growth villages) inevitably has an impact on the Green Belt. The Council's Matter 7 statements, supported by the Distribution of Development Paper (HO25PM) and the Green Belt Background Paper (EXAM 45) show how the Council has considered these impacts. In the circumstances, the Council considers they are clearly justified by the need to boost significantly the housing supply, to meet local need and to provide a range of choice of sites.

- c) However, in considering how to address the challenges set out b) above, the Council has considered the merits of a staggered housing requirement figure whereby the requirement is based on the District's Objectively Assessed Need up until the date of adoption and thereafter the housing requirement is increased to a level that ensures the full Local Plan housing requirement is met by 2029. Such an approach could be coupled with a less dispersed pattern of development as considered in the Sustainability Appraisals (SA10 and SA11PM – see pages 52-54, 56). This alternative could be developed to exclude a number of the smaller rural Green Belt allocations (these areas would be retained as Green Belt) and instead propose a larger site on the edge of the urban areas such as some of the land proposed for safeguarding. Whilst there may be benefits of this approach in terms of managing the impact on the Green Belt adjacent to villages, the Council is of the view that the approach set out in the Local Plan is consistent with the NPPF (both in terms of housing supply and Green Belt policies) and that the benefits set out in a) above outweigh the benefits of this alternative approach.
- d) However, to assist the Examination and to address the questions directly, Appendix B sets out how the staggered approach could work and the impact it would have in terms of Green Belt allocations, overall housing supply and the 5 year housing supply.

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

- a) The Council's position regarding 5 year supply on adoption is set out in the table at paragraph 36 of the Housing Supply Topic Paper (HO27PM). This shows a requirement of 8392 dwellings and a supply of 8694 dwellings giving 5.18 years supply summing adoption at 1<sup>st</sup> April 2017.
- b) This is based on the following assumptions:
- i) The estimated level of completions in 2016/17 as set out in Appendix 1b of HO27PM is achieved. The Council contends this is a reasonable assumption to make as this supply is entirely comprised of sites that already have planning permission. Many of the dwellings forecast for completion during 2016/17 are on larger sites where construction is underway and build-out rates are expected to be high during the year, for instance: -
    - Land north of Oakley Wood Road;
    - Woodside Farm;
    - Opus 40;
    - Grove Farm / Harbury Gardens;
    - Lower Heathcote Farm;
    - Land at Earl Rivers Ave;
    - Binswood Hall;
    - Land north of Harbury Lane;
    - Land south of Fieldgate Lane;
    - Land west of Wellesbourne Road;
    - Land east of Radford Semele.

Further, the 2016 monitoring showed that there were already 699 dwellings currently under construction.

- ii) Small Urban SHLAA sites will come forward as forecast in Appendix 1c of the Housing Supply Topic Paper (HO27PM). This is considered to be a reasonable assumption for the reasons set out in answer to question 3e) above.
  - iii) Windfall completions will come forward at the rates set out in Appendix 1d of the Housing Supply Topic Paper (HO27PM). This is considered to be a reasonable assumption given the evidence set out at 3 f) above which shows that the strong historic supply of windfalls is continuing in 2016/17. The windfall allowance has been discounted until 2019/20 to avoid double counting with existing planning permissions, and so only three years' of windfalls are included within the supply
- c) The Council therefore contends that all its assumptions regarding the 5 year supply on adoption are reasonable and justified by the evidence. As a result the 5 year supply on adoption is considered be realistic.
- d) The Council accepts that a 5.18 year supply at the point of adoption provides only a modest degree of flexibility upon the adoption of the local plan. That is consistent with the approach taken by many other local planning authorities facing the task of significantly boosting the supply of land for housing from comparatively lower historic levels of delivery. However it is justified by the fact that as the plan becomes embedded developers are likely to ramp up delivery year on year as illustrated by the trajectory: see paragraph 37a of the Housing Supply Topic Paper (HO27PM) and Table 7e below.
- e) The table below sets out how that the 5 year supply will be maintained through the Plan period. It shows the forecast land supply for each year of the Local Plan up to 2024. This is based on a 20% buffer for 2017, 2018 and 2019, reducing to a 5% buffer thereafter and assumes completions in line with the housing trajectory set out in Appendix 1 of HO27PM. The detailed calculations for the requirement are set out in Appendix C of this Matter Statement.

<b>Year</b>	<b>Requirement</b>	<b>Forecast Supply</b>	<b>No. of Year's Supply</b>
2017 - 2022	8392	8694	5.18
2018 - 2023	7958	8917	5.60
2019 - 2024	6978	8273	5.93
2020 - 2025	5045	7231	7.17
2021 - 2026	4035	6063	7.51
2022 - 2027	3192	5038	7.90
2023 - 2028	2608	4182	8.01
2024 - 2029	2435	3470	7.13

### Matter 3 Appendix A: Analysis of Expired Permissions 1999 - 2016

Year	Expiries	New Permissions
1999/00	14	442
2000/01	6	1800
2001/02	35	946
2002/03	16	854
2003/04	16	500
2004/05	18	1,225
2005/06	31	1,061
2006/07	17	1,162
2007/08	45	224
2008/09	41	53
2009/10	98	149
2010/11	113	206
2011/12	40	273
2012/13	11	692
2013/14	6	1,480
2014/15	48	728 *
2015/16	259	5,562 *
<b>Total</b>	<b>814</b>	<b>17357</b>
<b>Expiries as a proportion of permissions 1999 - 2016</b>		<b>4.69%</b>
<b>Expiries as a proportion of permissions 2011 - 2016</b>		<b>4.17%</b>

\* technically more permissions were granted in 14/15 and less in 15/16 but due to some duplication of values in 14/15 housing database with those in 2015/16 housing database (e.g. reserved matters etc) the simplest way of getting an accurate figure is to use 2015/16 database data only for both queries rather than 2014/15 database and the 15/16 database.

## **Staggered Approach to 5 Year Housing Land Supply**

### **Purpose**

- 1 To apply a staggered approach to the 5 year housing requirement to enable a reduction in the number of smaller Green Belt releases proposed in rural areas, at the same time as being able to demonstrate a 5 year housing land supply on adoption.

### **Basis**

- 2 This approach starts by proposing the removal of a number of rural Green Belt allocations. Whilst the Council has not done any detailed analysis to suggest which sites would be most appropriate, this example assumes that all the additional rural Green Belt allocations proposed in the 2016 modifications are de-allocated:
  - East of Cubbington : 95 dwellings
  - South of Lloyd Cloe: 115 dwellings
  - North of Roswood Farm (southern extension): 45 dwellings
  - North of Birmingham Road (extended area): 40 dwellings
  - Brownley Green Lane: 55 dwellings
  - Leek Wooton Police HQ: 115 dwellings
  
  - Total: 465 dwellings
- 3 If these sites were removed and were not replaced, the overall level of flexibility would fall to 750 dwellings or 4.4% of the overall requirement.
- 4 This would give a housing land supply over the first 5 years of the Plan of 8354 dwellings and based on a 5 year requirement of 8392 (see table at 5b of the Council's Matter 3 Statement), this would give a 5 year housing land supply of 4.98 years. At best (even if one or two of the excluded sites were re-introduced) this approach indicates only a marginal 5 year land supply on adoption and a less healthy level of flexibility.
- 5 As an alternative, these sites could be replaced by one of the areas of land proposed for safeguarding. Again, the Council has not carried out detailed analysis to suggest which, but if the evidence supported this approach it could be assumed that in either case the additional housing capacity within the Plan period would be in the region of 600 dwellings (the site may have capacity beyond this, but unless it can be shown otherwise, delivery rates of approx. 100dpa could be assumed - this would suggest 600 dwellings by 2029 is realistic) and that (taking

account of the planning process and the delivery of the existing allocations) only a small proportion of this (perhaps 50 to 100 dwellings) is likely to be within the 5 year period on adoption.

### Applying the Staggered Approach

- 6 Whilst not preferred by the Council, a staggered approach to the 5 year housing requirement could be justified for the reasons set out in 6b and c of the Council's Matter 3 Statement. In this approach, the 5 year requirement would be calculated as follows:

<b>ALTERNATIVE FIVE YEAR REQUIREMENT AT 31ST MARCH 2017</b>	
	<b>Dwellings</b>
Annual Requirement 1/4/11 to 31/3/17 (6yrs)	600
Annual Requirement 1/4/17 to 31/3/29 (12yrs)	1098
Requirement 01/04/2011 to 31/03/2017 (6yrs x 600)	3600
Less completions 01/04/11 to 31/03/16	-2102
Less estimated completions 1/04/16 to 31/03/17	-1157
<b>Sub Total (shortfall since 2011)</b>	<b>341</b>
Five Year Requirement 01/04/2017 to 31/03/2022 (5yrs x 1098)	+5490
<b>Sub Total</b>	<b>5831</b>
Plus 5% Buffer	+292
<b>Five Year Requirement 1/4/17 - 31/03/22</b>	<b>6123</b>

- 7 Against a 5 year supply of 8404 (8354 plus 50 for the additional allocation – see para 5 above), this would provide a 5 year housing land supply 6.86 years on adoption and a 5 year supply would be maintained throughout the Plan period.
- 8 This alternative approach would provide an overall supply of 18126, providing flexibility of 1350 dwellings or 8.04% over the requirement.

### Conclusions

- 9 Purely in terms of housing supply, the Council is content that this alternative approach would be effective. However for the reasons set out in 6a of the Council's Matter 3 Statement, this is not the Council's preferred approach to the distribution of development and the site allocations.

Warwick District Council Examination In Public  
Matter 3 – The supply and delivery of housing land  
Appendix C

<b>THE FIVE YEAR REQUIREMENT AT 31ST MARCH 2020</b>	
	<b>Dwellings</b>
Annual Requirement	932
Requirement 01/04/2011 to 31/03/2020(9yrs x 932)	8388
Less completions 01/04/11 to 31/03/16	-2102
Less estimated completions 1/04/16 to 31/03/20	-6141
<b>Sub Total (shortfall since 2011)</b>	<b>145</b>
Five Year Requirement 01/04/20 to 31/03/2025 (5yrs x 932)	+4660
<b>Sub Total</b>	<b>4805</b>
Plus 5% Buffer	+240
<b>Five Year Requirement 1/4/20 - 31/03/25</b>	<b>5045</b>

<b>THE FIVE YEAR REQUIREMENT AT 31ST MARCH 2021</b>	
	<b>Dwellings</b>
Annual Requirement	932
Requirement 01/04/2011 to 31/03/2021(10yrs x 932)	9320
Less completions 01/04/11 to 31/03/16	-2102
Less estimated completions 1/04/16 to 31/03/21	-8076
<b>Sub Total (oversupply since 2011)</b>	<b>-858</b>
Five Year Requirement 01/04/21 to 31/03/2026 (5yrs x 932)	+4660
Plus 5% Buffer	+233
Less oversupply	-858
<b>Five Year Requirement 1/4/21 - 31/03/26</b>	<b>4035</b>

<b>THE FIVE YEAR REQUIREMENT AT 31ST MARCH 2022</b>	
	<b>Dwellings</b>
Annual Requirement	932
Requirement 01/04/2011 to 31/03/2022(11yrs x 932)	10252
Less completions 01/04/11 to 31/03/16	-2102
Less estimated completions 1/04/16 to 31/03/22	-9851
<b>Sub Total (oversupply since 2011)</b>	<b>-1701</b>
Five Year Requirement 01/04/22 to 31/03/2027 (5yrs x 932)	+4660
Plus 5% Buffer	+233
Less oversupply	-1701
<b>Five Year Requirement 1/4/22 - 31/03/27</b>	<b>3192</b>

<b>THE FIVE YEAR REQUIREMENT AT 31ST MARCH 2023</b>	
	<b>Dwellings</b>
Annual Requirement	932
Requirement 01/04/2011 to 31/03/2023(12yrs x 932)	11184
Less completions 01/04/11 to 31/03/16	-2102
Less estimated completions 1/04/16 to 31/03/23	-11367
<b>Sub Total (oversupply since 2011)</b>	<b>-2285</b>
Five Year Requirement 01/04/23 to 31/03/2028 (5yrs x 932)	+4660
Plus 5% Buffer	+233

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Less oversupply	-2285
<b>Five Year Requirement 1/4/23 - 31/03/28</b>	<b>2608</b>

<b>THE FIVE YEAR REQUIREMENT AT 31ST MARCH 2024</b>	
	<b>Dwellings</b>
Annual Requirement	932
Requirement 01/04/2011 to 31/03/2024(13yrs x 932)	12116
Less completions 01/04/11 to 31/03/16	-2102
Less estimated completions 1/04/16 to 31/03/24	-12472
<b>Sub Total (shortfall since 2011)</b>	<b>-2458</b>
Five Year Requirement 01/04/24 to 31/03/2029 (5yrs x 932)	+4660
Plus 5% Buffer	+233
Less oversupply	-2458
<b>Five Year Requirement 1/4/24 - 31/03/29</b>	<b>2435</b>