

## WFDC Response to Savills on ED48 statement

Wyre Forest District Council makes the following response to the points raised by Savills:

- Calculations have been run using different scenarios as requested by the Planning Inspector at the hearing session on Matter 7.
- Agree that a 20% buffer is now required in the light of the HDT result published in January 2021.
- Windfall allowance calculation starting point – the Plan period runs from 2016 so the Council could have looked purely at windfall trends since that date. However, 2011 was chosen as that was the start of the existing Plan period (2011-26). The NPPF definition of a windfall site now includes greenfield and a 10 year timeframe is considered robust. It would not be a good use of resources to rerun the calculations back as far as 2008 as previously done for the previously developed sites.
- The windfall allowance will only be applied to years 4 and 5 to avoid double counting.
- Inclusion of allocations for less than 10 dwellings in 5 year supply – the Council considers that the inclusion of 3 sites totaling 12 dwellings in years 4 and 5 will have minimal impact on the overall calculation of the 5 year supply and the application of a discount is not therefore considered necessary.
- C2 accommodation – agree – as C2 requirement is separate from overall housing requirement it does not need to be factored into supply.