
ED48 Statement

Wyre Forest District Local Plan Examination
Response on Behalf of W4 Estates Limited and
Gaynor Gillespie

Representor ID: 859769

Subject: ED48



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1. Statement

1.1. Introduction

1.1.1. Savills has been instructed by W4 Estates Limited and Gaynor Gillespie to submit a Statement in response to the focussed consultation on document ED48 of the Wyre Forest District Local Plan Examination.

1.2. Overall Comments on the Approach

1.2.1. Wyre Forest District Council (WFDC) needs to be able to put forward a robust evidence base position, from which firm and clear conclusions can be drawn, which should then be clearly used to support the production and monitoring of the new Local Plan. Document ED48 should form part of this process.

1.2.2. We understand that ED48 has been produced in order to provide a revised calculation of the WFDC 5 year housing land supply position and enable the 5 year housing land supply to be confirmed as part of the Local Plan Examination process. ED48 identifies that WFDC considers that it can demonstrate the existence of a 5 year supply of deliverable housing land.

1.2.3. However in order for the document to be able to fully inform the plan-making process and be used as the basis for monitoring purposes going forward it is considered that WFDC should put forward a single definitive calculation for what the current housing land supply position is based on clear reasoned inputs. Further comments in relation to some of the inputs are set out within the remainder of this Statement.

1.3. The “Buffer”

1.3.1. WFDC is correct in identifying that a 20% buffer should currently be applied in response to the latest Housing Delivery Test Result. This still applies if WFDC is seeking to confirm the 5 year housing land supply as part of the Local Plan Examination process¹. Consideration of the 10% buffer should therefore be disregarded as part of the current five year housing land supply update.

¹ Planning Practice Guidance Paragraph: 010 Reference ID: 68-010-20190722.



1.4. Windfall Allowance

1.4.1. WFDC has evidenced in Table 1 of ED48 that dwellings have consistently been delivered on unallocated sites of less than 10 dwellings since 2011. However in document ED10² WFDC proposed windfall data from 2008. It is not clear why WFDC has now chosen to disregard the data from period 2008-2011 and what impact this might have on the resultant average windfall figure.

1.4.2. It is therefore requested that either the equivalent data is provided for 2008-2011 to ensure that a consistent and transparent approach is being presented or a reason given for why this period is no longer considered to be relevant. Nevertheless on a point of principle it is considered that WFDC does have a rationale for including a windfall allowance informed by average historic delivery should it wish to do so.

1.4.3. It is noted that the Trajectory at Appendix 2 of ED48 includes projected completions on unallocated sites with planning permission for the first 3 years of the 5 year period. It is prudent that windfall allowance is not applied to the first 3 years of this period to avoid the potential for double counting.

1.4.4. Whilst the majority of the proposed allocations in the emerging Local Plan are on sites of 10 or more dwellings, giving credence to choosing a windfall allowance threshold of less than 10 dwellings, it is also noted that the Trajectory at Appendix 2 includes the following allocations within the last 2 years of the 5 year period (2024/2025 and 2025/2026):

Allocation	Capacity (Dwellings)	Year
Fold Farm	6	2024/2025
Red Lion Car Park	2	2024/2025
Caunsell Road	4	2025/2026

1.4.5. Given that it is recognised that the above allocated sites could have otherwise come forward as windfall sites³ then it is considered that a discount should be applied to the average windfall allowance for years 4 and 5 to account for the capacity of these sites to ensure that the approach taken is robust and consistent. The average windfall rate which might be applied to years 4 and 5 should accordingly be less than the

² ED10 – WFDC Five Year Housing Land Supply Report at April 1st 2020. Table 10.

³ ED48 – WFDC Update to Five Year Land Supply at 1st April 2021. Paragraph 2.5.

annual average of 72 dpa identified⁴, subject to what the data shown for the 3 years from 2008/09 – 2011/12 shows.

1.4.6. This is not considered to be inconsistent with the approach taken to accounting for windfall sites previously because WFDC did not receive delivery on allocated sites for less than 10 dwellings during the current Local Plan Period. Whilst there is currently an allocation for 6 dwellings at the Former Workhouse on the High Street in Bewdley⁵, this has not come forward for residential development.

1.5. Lapse Rates

1.5.1. WFDC has demonstrated that planning permissions have lapsed during the vast majority of the 19 years for which data has been provided in Table 3 and therefore it has been proven that it is appropriate to apply an evidenced average lapse rate (4%) to the permissions and allocations which WFDC is seeking to rely upon in the housing land supply for the 5 year period to ensure that the approach taken is robust.

1.6. C2 Accommodation

1.6.1. The Planning Practice Guidance identifies that “*Local Planning Authorities will need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply*”⁶. However if C2 accommodation does not get factored into the overall housing need figure for the five year period within the calculation then it should definitely not be included as part of the supply.

1.7. Conclusion

1.7.1. WFDC needs to be clear and robust on its inputs for this housing land supply calculation, not only to reach a definitive conclusion on the housing land supply position to fix it as part of the Local Plan Examination process but also to provide a clear methodology to follow to allow for comparable ongoing monitoring of the position in future years.

1.7.2. This particular calculation should be based on applying a 20% buffer to the housing need position and a 4% lapse rate to the committed supply position. The trajectory for housing land supply should also take

⁴ ED48 – WFDC Update to Five Year Land Supply at 1st April 2021. Paragraph 2.4.

⁵ WFDC Site Allocations and Policies Local Plan Document (July 2013) Policy SAL.B2.

⁶ Planning Practice Guidance. Paragraph: 035 Reference ID: 68-035-20190722.



account of the discussion held during the Local Plan Examination process on the deliverability of individual sites and the requirement to count housing provided in Use Class C2 as part of the housing land supply.

- 1.7.3. WFDC has demonstrated that it has been able to rely on the delivery of windfall sites of less than 10 dwellings in the past and should it decide to include an allowance in years 4 and 5 then this should factor in the reliance which is already being placed on the delivery on allocated sites of less than 10 dwellings in this period to avoid double counting.

Hearing Statement

Wyre Forest District Local Plan Examination



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