

Wychavon Five Year Housing Land Supply Report

2019

Includes: Position statement at 1 April 2019, methodology, analysis and evidence supporting the five year housing land supply calculation.

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1. Introduction

1.1 This report provides a full explanation of the five year housing land supply (5YHLS) calculation for Wychavon District Council as required by the National Planning Policy Framework (NPPF) and the South Worcestershire Development Plan (SWDP) (February 2016) policy SWDP3. It sets out the housing requirement, delivery to-date and identifies deliverable housing sites for the five year period 1 April 2019 to 31 March 2024. The report includes an appropriate in-depth analysis of sites with planning permission and those that are allocations in the adopted SWDP to provide additional evidence about deliverability and to ensure that the supply calculation is robust.

1.2 It should be noted that, due to the implementation of a new IT system which incorporates Policy Monitoring, site visits for the 2019 Monitoring Year were delayed by approximately 4 weeks. The consequence of this delay is an increased period of completions of approximately 13 months for the 2019 Monitoring Year, with the 2020 Monitoring Year completions period reduced to approximately 11 months accordingly. Due to the robust nature of the calculation, this delay has not been deemed detrimental to the five year supply figure for Wychavon.

2. Housing Requirement

2.1 Prior to the adoption of the SWDP, Wychavon used the full objectively assessed housing need figure for the Plan period 2006-2030 of 9,950 dwellings. This policy-off figure had been tested by the SWDP Examination Inspector and set out in the Inspector's Further Interim Conclusions on the Outstanding Matters Considered at the Reconvened Stage 1 Hearing¹ (31 March 2014). The SWDP went through a further period of Examination where a policy-on housing requirement was agreed by the Inspector and the SWDP was found to be sound.

2.2 The adoption of the Plan means that a policy-on target now applies for Wychavon District. 10,600 dwellings are required to be delivered between 2006 and 2030 as set out in Policy SWDP3 (Table 4b(i)). The increase in the target also means that the annual requirement has changed. The SWDP Inspector endorsed a stepped target as set out in Policy SWDP3 (Table 4b(ii)). A policy-on

¹ <http://www.swdevelopmentplan.org/?s=Further+Interim+Conclusions>

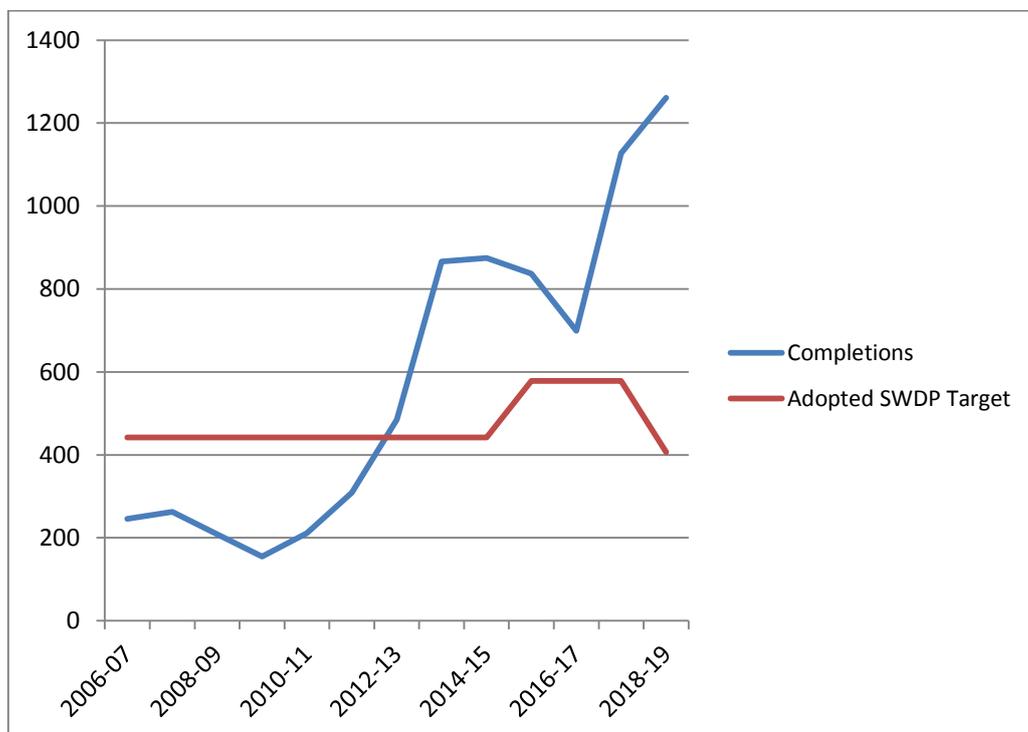
target of 442 dwellings per annum is used from 2006-2015 followed by a requirement of 578 dwellings per annum for three years (2015-18), the target is then reduced to 407 dwellings per annum for the remainder of the Plan period (until 31 March 2030). This short term increase in housing target is to allow for lead-in times on the larger urban extensions in the Wider Worcester Area (WWA) (i.e. SWDP45/1 and SWDP45/2) and to ensure the SWDP as a whole and across all sub-areas has a rolling five year supply of housing.

2.3 It is important to note that the WWA five year housing land supply position will be calculated and published separately to the Wychavon calculation, as recommended by the SWDP Examination Inspector. There will be two separate WWA calculations; one for Wychavon District WWA and one for Malvern Hills WWA (SWDP3 Table 4b(ii) refers).

3. Completions

3.1 2018-19 saw record completions of **1,261**, more than three times the annual requirement set out in SWDP3. This means that from the outset of the Plan period 1 April 2006 to 31 March 2019 there have been **7,543** completions; overall this is significantly **above** the cumulative annual requirement for completions from 2006. In fact completions over the last five years have been well above the annual requirement, with completions from 1 April 2014 to 31 March 2019 totalling 4,799 against a cumulative annual requirement of 2,583. This demonstrates Wychavon's success in addressing the previous shortfall by taking a positive and proactive approach and approving a significant number of housing developments beyond the former Wychavon District Local Plan (WDLP) GD1 Development Boundaries since 2010, and more recently in adopting the SWDP.

Figure 1 Completions in Wychavon District from 1 April 2006 - 31 March 2019



4. Calculating Past Under or Over Supply

4.1 Any shortfall in delivery, or indeed substantial over supply, against the annualised requirement is factored in to the five year supply calculation.

4.2 The housing requirement, as explained above, is that endorsed by the SWDP Examination Inspector and set out in Policy SWDP3 (Tables 4b(i) and 4b(ii)). The requirement for Wychavon District (excluding the Wider Worcester Area) is 10,600 dwellings for 2006-2030. The Inspector supported a stepped approach of 442 dwellings per annum from 2006-2015, 578 dwellings per annum from 2015-2018 and 407 dwellings per annum for the remainder of the Plan period until 2030. Therefore, the requirement for the thirteen years from 2006-2018 is 9 years at 442 dwellings plus three years of 578 dwellings and one year of 407 dwellings, which equates to 6,119 dwellings. To establish whether there is an under or over supply all completions during this period are taken off this requirement figure.

$$6,119 \text{ (Requirement 2006-2019)} - 7,543 \text{ (Completions 2006-2019)} = 1,424 \text{ (surplus)}$$

4.3 Wychavon District Council has worked positively to address the former undersupply and now has a significant surplus in supply against the cumulative target. The state of the housing market is a significant factor in performance, and shortfalls have been a feature since the start of the SWDP Plan period in 2006. To highlight the significant progress made in recent years the shortfall in 2011-12 was 1259 dwellings. 2016-17 saw the first surplus of the Plan period of 21 dwellings; this has significantly increased to 1,424 dwellings in 2018-19. There are some 586 dwellings currently under construction, which is only slightly lower than the all time high of 653 in 2016/17; therefore it is likely that this surplus will increase in the next 12 months.

5. Addressing Past Oversupply

5.1 In terms of addressing the oversupply, rather than reduce the target by the full oversupply in the first five years, the Council have adopted a cautious approach and spread the oversupply over the remaining plan period. When this approach has been used to deal with undersupply it has been called the 'Liverpool approach'. The 1,424 dwelling surplus has been divided by the number of years remaining in the plan period (11) and multiplied by five years to establish the number that can be deducted from the five year target. Therefore in this case the Council are deducting 645 dwellings from the 5 year target.

$$1,424 \text{ (surplus)} \div 11 \text{ (years remaining in plan)} = 129 \text{ (discount per annum from target)}$$

$$129 \text{ (discount per annum from target)} \times 5 \text{ (years)} = 645 \text{ (discount from 5 year target)}$$

$$2,035 \text{ (5 years} \times 407) - 645 \text{ (discount from 5 year target)} = 1,390 \text{ (5 year target taking account of oversupply)}$$

6. Buffer

6.1 In accordance with the NPPF (paragraph 73), Wychavon is required to test its supply of sites against the housing requirement with an additional buffer. The South Worcestershire Council's latest Housing Delivery Test measurement (2018, published February 2019) is 187%, so in accordance with National Planning Practice Guidance (Paragraph: 037 Reference ID: 3-037-20180913), the Council

consider that the application of a 5% buffer is reasonable and appropriate. A five percent buffer equates to an additional 70 dwellings.

1,390 (5 year target) + 70 (5% buffer) = 1,460 (5 year target with 5% buffer applied)

7. Lead Times and Delivery Rates

7.1 Before explaining the different categories of sites which will deliver housing within Wychavon District in the next five years, it is important to set out the approach that has been taken by the Council to ensure that the supply is robust.

7.2 A substantial amount of detailed work has been undertaken to assess sites and to identify the number of dwellings that will be delivered within the next five years. Large sites (10 or more dwellings) have been carefully assessed as these represent a significant proportion of the current sites with planning permission not yet started, and are therefore a very important component of supply.

7.3 Where work is already underway on large sites, Officers have critically assessed the delivery rates to establish whether the total number of dwellings with planning permission can realistically be achieved within a five year period. Factors that can influence the delivery rate include the number of developers (outlets) on site, the type of site, e.g. brownfield / greenfield and the type of infrastructure requirements to be provided. In many cases sites are small enough to easily be delivered within five years based on existing local build rates (see Appendix 4 for a site by site breakdown). The largest sites are generally being developed by developers who have established delivery trends in Wychavon District which are taken into account by Officers when forecasting future delivery.

7.4 In looking at large sites with planning permission where there has been no start made as at 1st April 2019 and for allocated sites without planning permission developers, promoters and landowners have been engaged to understand their intentions for delivery and to consider what evidence there is that house completions will begin within the next five years. This information is provided in Appendix 6. The information has been considered in conjunction with local evidence

regarding lead in times and delivery rates recently experienced in Wychavon so as not to simply rely without question on the statements and information provided by landowners, developers and house builders in respect of their own sites. In adopting this cautious and practical approach the Council has assumed the following, unless there is extremely robust clear evidence to suggest otherwise:

1. On allocated sites where an application has been submitted and a housebuilder is the applicant and has responded to the Deliverability Questionnaire about its intentions to start on site, it has been assumed that it will take 30 months until the first legal completion is achieved unless there are any other specific reasons that suggest otherwise. On large sites where an application has been approved subject to a Section 106 agreement it has been assumed that it will take 24 months until the first legal completion is achieved, unless there are any other specific reasons that suggest otherwise. This has been reduced to 18 months where outline planning permission has been granted (i.e. a Section 106 signed); and 12 months where full planning permission has been granted. This is considered a cautious approach as it has been demonstrated in the District that developers have and continue to achieve initial completions within one year of getting full planning permission on the large sites unless there are site specific constraints (see Appendix 4). Local evidence demonstrates that smaller large schemes, for example those between 10 and 20 dwellings, are completely built out within 12 months once a house builder is on site.
2. A conservative delivery rate of 40 dwellings per annum per 'outlet' has been assumed for volume house builders (e.g. Taylor Wimpey, Bovis etc.) once a site is up and running and into its first full year of production although the local evidence provided in Appendix 4 shows that this has been higher in Wychavon District. This assumption is also supported by analysis undertaken by White Young Green in National House builders' annual reports looking at the number of sites and the number of completions over a particular year, although this work is not specific to Wychavon District. Where there is strong local evidence of a particular house builder delivering higher rates on a similarly sized site this has influenced Officer assumptions about build rates and any assumptions are clearly stated in the text in either section 8 or 9.

3. In some cases for the large sites where it is known that affordable housing will be delivered separately to the market dwellings e.g. by a Registered Social Landlord, the 40 dwellings per annum has been increased by 40% to 56 dwellings per annum.
4. Previously the location and proximity of sites coming forward has been taken into account as they may be in direct competition with each other and therefore may affect delivery rates. However, work produced by GL Hearn in relation to sites on the edge of Droitwich Spa (Droitwich Spa Local Housing Market Assessment, February 2013) suggests there would be no impact on build rates and this has also been borne out by several developments in Evesham being built out alongside each other with no detrimental effect on delivery. Therefore such caution is only really likely to be applicable in the more rural locations.

7.5 Although the evidence provided demonstrates that in most cases Wychavon is delivering above the levels of these assumptions, a cautious approach has been taken to ensure that the 5YHLS position is as robust as possible.

8. Sites with Planning Permission not Started or Under Construction

8.1 A full list of sites with planning permission not started or under construction (at 31st March 2019) is set out in Appendix 2.

8.2 The NPPF Glossary definition of 'Deliverable' states that *"to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years"*. It adds that *"sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans)"*, and that *"where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years"*.

8.3 All sites with planning permission have been reviewed and there are a few sites, for reasons set out below, that have been discounted as there is sufficient evidence that they will either not be implemented at all within five years, or due to phasing it is likely to take longer than five years to deliver the total number permitted.

8.4 To inform this decision-making process all large sites (10 dwellings and over) where there was no start on site at 1st April 2019 were sent a Deliverability Questionnaire (Appendix 5). The responses to this detailed questionnaire have been considered and taken into account when making assumptions about the delivery of these sites; although disappointingly not all developers have responded (all detailed responses are published in a table at Appendix 6). In most cases the phasing set out in section 7 of this report has been used in conjunction with local delivery data set out in Appendix 4 as many developers already have a proven track record of delivery in the District. By considering all this data along with any additional information that developers and agents have provided Officers have made the 5YHLS position as robust as possible.

8.5 The Council has not relied upon C2 use in the five year supply calculations, although this has and will continue to provide an element of C3 supply. The Council will scrutinise C2 applications in the future to ensure the use is correctly defined and where all the facilities for each unit (dwelling) are behind its own front door this will be classified as C3 and therefore contribute towards the 5YHLS.

8.6 A Summary of discounted sites with planning permission not started is set out below (for full assessment see Appendix 3):

96/00597 Leedons Residential Park, Broadway, Worcestershire, WR12 7HB for 114 dwellings

74 units have been completed in the last 6 years, on average 12 per annum. The owner has invested significantly in the site facilities and continues to actively advertise. There are currently 26 plinths in place and it is reasonable to assume that these will be delivered in the next 5 years based on the last 5 years. However Officers remain cautious with those that have not commenced and have not included them in the five year supply.

114 dwellings discounted.

15/03029 Land rear of, Roman Meadow, Eckington for 25 dwellings

This site has outline planning permission for the erection of 25 dwellings. The site, including additional land, is being promoted through the Eckington Neighbourhood Plan (currently under Examination) for 38 dwellings, alongside a current planning application for 38 dwellings which is pending determination (19/00968). Given this current uncertainty, a cautious approach has been adopted and Officers have decided to discount this site from the supply.

25 dwellings discounted.

14/02751 Land between Kings Road and, Northwick Road, Evesham for 13 dwellings

There has been no response from the agent of this site. Given there have been issues raised previously with regard to viability, and as the permission is due to expire in October 2019, in adopting a cautious approach this site has been discounted from the supply until there is evidence to support the site being delivered within five years.

13 dwellings discounted.

15/00923 Former Gas Depot, Common Road, Evesham for 123 dwellings

There has been no response from the promoter of this site. The development includes the demolition of existing buildings and there are known viability issues. On that basis, Officers have adopted a cautious approach and decided to discount this site from the supply until there is evidence to support the site being delivered within five years.

123 dwellings discounted.

18/01722 Land West of Cheltenham Road, Evesham for 460 dwellings

Bloor Homes were on site almost immediately after being granted Reserved Matters for Phase 1 of this development, which totals 238 dwellings, with 13 dwellings already under construction. In keeping with a cautious approach, delivery of 40 dwellings per annum is assumed, and thus 200 dwellings are considered deliverable within five years.

247 dwellings discounted.

14/00308 Worcestershire Hunt Kennels, Kennels Lane, Fernhill Heath for 87 dwellings

Although there has been a start made on site with the footings of plot 1 dug, there has not been any progress since. As there is no clear evidence that this site is deliverable within five years, in keeping with a cautious approach it has been discounted from the supply.

86 dwellings discounted.

13/00132 Land Adjacent to, Sims Metals UK (South West) Limited, Long Marston, Pebworth for 380 dwellings

This site has outline planning permission with two current Reserved Matters applications approved subject to Section 106 agreement (16/01618 & 17/01269). The developer has indicated that work is expected to commence in March 2020, with 60 dwellings per annum to be delivered once the site is up and running. Assuming a more cautious 18 months lead in time and 40 completions per annum, it is considered that 140 dwellings are deliverable within five years.

240 dwellings discounted.

15/01036 Land west of, Station Road, Pershore for 176 dwellings

The site has full planning permission for the erection of 176 dwellings, although the agent has indicated that they have submitted a new full planning application for the development of 190 dwellings. The developer has indicated that there will be one housebuilder on site and development will commence from June 2020. Due to the uncertainty and in keeping with a cautious approach, the Council have assumed completions from 2022-23 at a more cautious build rate of 40 dwellings per annum, it is therefore considered that 80 dwellings are deliverable within five years.

96 dwellings discounted.

17/00432 Allesborough Farm, Allesborough Hill, Pershore for 27 dwellings

No response has been received from the agent of this site. Given the development requires the demolition of existing farm buildings and the removal of hardstanding, and in the absence of confirmation from the agent that the site will be developed within five years, the Council are adopting a cautious approach and discounting this site from the five year supply.

27 dwellings discounted.

Total number of dwellings with planning permission not started = **2,608**

Total number discounted from delivery within next five years = **971**

2,608 - 971 = 1,637

Total number of deliverable dwellings* with planning permission not started = 1,637

*within five years

9. Deliverable Allocated Sites in the Adopted SWDP (2016)

9.1 All sites allocated in the adopted SWDP including: those with planning permission but not yet started; those with a resolution to grant planning permission; and those without planning permission were sent a Deliverability Questionnaire.

9.2 This questionnaire is sent annually to landowners, developers and promoters and provides an updated picture on the progress of the site, the intentions of stakeholders and highlights any slippage. Where the contact has not responded to the update request a previous response has been used unless it is well out of date along with Officer's careful consideration of the factors relevant to the site. All responses have been scrutinised by Officers and not simply relied upon without question.

9.3 The questionnaire includes questions about any known viability issues, any site specific constraints and more detailed questions around phasing and delivery. Questions include: when do you expect to start work on site (month/year)? How many housebuilders will/are likely to develop the site? How many completions do you expect to achieve each year (April to April)? And therefore how many homes do you anticipate being delivered on site within the next five years to April 2024? (See Appendix 5 for full Deliverability Questionnaire).

9.4 In assessing the questionnaires to ensure that the assumptions are as robust as possible **only sites where the landowners/ agents/ developers have already submitted a planning application** have been included as deliverable SWDP sites. This is considered a conservative approach as there are a number of additional sites that are highly likely to be delivered within five years but the promoter has yet to submit a formal application.

9.5 There are no sites which have been included in the 5YHLS calculation as a deliverable SWDP site within five years.

Total number of deliverable allocated dwellings* in the adopted SWDP = 0

*within five years

10. Lapse Rate

10.1 The Inspector conducting the SWDP Examination concluded that adopting a 5% lapse rate would be “robust and sound” for the Plan across the three administrative areas. Therefore, Wychavon have used the Inspector’s methodology for calculating lapse rate and applied a 5% lapse rate to all commitments that have not commenced at 1 April 2019.

10.2 It should be noted that Wychavon has had a considerably lower lapse rate than that of Worcester City and Malvern Hills District. Appendix 7 provides evidence on lapse rates by site from 2006/07 to 2018/19 in Wychavon District.

10.3 Summing all the ‘lapsed permitted dwellings’ from 2006/07 to 2018/19, and dividing that by the total number of dwellings with outstanding planning permissions over the same period, gives an average lapse rate of 2.67%. In keeping with a cautious approach Wychavon has adopted a generous 5% lapse rate making the Council’s position more robust.

A cautious **5 % Lapse rate** has been assumed.

Table 1 Wychavon Planning Permission Lapse Rates 2006-2019

| Year of Expiry | Number of Dwellings Expired | Total outstanding Commitments (excludes Local Plan Allocations) | Lapse Rate % |
|------------------------------------|-----------------------------|---|--------------|
| 2006/07 | 17 | 830 | 2.00% |
| 2007/08 | 6 | 1129 | 0.50% |
| 2008/09 | 69 | 987 | 7.00% |
| 2009/10 | 30 | 947 | 3.20% |
| 2010/11 | 80 | 1355 | 5.90% |
| 2011/12 | 37 | 1864 | 2.00% |
| 2012/13 | 14 | 3127 | 0.40% |
| 2013/14 | 57 | 3403 | 1.70% |
| 2014/15 | 125 | 4869 | 2.60% |
| 2015/16 | 42 | 5251 | 0.80% |
| 2016/17 | 207 | 4685 | 4.42% |
| 2017/18 | 48 | 3584 | 1.34% |
| 2018/19 | 73 | 2572 | 2.84% |
| Total over 13 years | 808 | 34619 | |
| Average over 13 year period | | | 2.67% |

11. Windfalls

11.1 A windfall² allowance may be justified in the five year supply if a local planning authority has “*compelling evidence*” as set out in paragraph 70 of the National Planning Policy Framework.

11.2 Given the above, the Inspector conducting the Examination into the SWDP confirmed in his Interim Conclusions (October 2013) that, in principle, he saw no objection to the Plan accounting for

² Windfalls are any sites that are not allocated sites in a Local Plan, have not been previously allocated or identified in the Strategic Housing Land Availability Assessment (SHLAA)

windfalls as part of the supply of housing over the plan period. Therefore an appropriate allowance has been accounted for in the 5YHLS calculation.

11.3 Appendix 8 contains a detailed breakdown of all windfall completions and concludes that small windfalls (9 or less) have been delivered at an average rate of 99 dwellings per annum from 2006/07 to 2018/19. Therefore taking a cautious approach the Council has continued to adopt the Inspector's lower assumption of 82 dwellings per annum looking forward.

11.4 In order to avoid double counting small windfall sites that already have planning permission, three years of windfalls are discounted from the five year calculation. This is consistent with the extremely cautious assumptions set out in the SWDP longer term trajectory. Therefore windfall completions are only assumed for two years from 2022/23 onwards.

A total of **164 windfalls** are added to the five year calculation (i.e. 2 x 82)

11.5 Looking at the future sustained delivery of windfall sites, Officers have in the longer term trajectory assumed that these sites will reduce over time. At this point in time however, for this five year supply calculation, there is no evidence indicating that this would be appropriate. However, to ensure that assumptions are up to date this will be monitored every year and if there is a decline in windfall development we will adjust our subsequent assumptions.

11.6 In looking forward and to ensure the assumptions are as robust as possible, Officers have also considered other potential factors which may affect windfall delivery including:

- The commencement of the Review of the SWDP, with the Preferred Options consultation scheduled for Autumn 2019.
- The continued implementation of a Community Infrastructure Levy (CIL) of £40 per m² for sites outside the main urban areas; adopted June 2017, albeit the CIL Examination Inspector concluded that at this rate development viability would not be jeopardised.
- Any specific new rural exception site initiatives/programmes with funding – this remains a top corporate priority for the Council to deliver affordable housing with Registered Social Landlord partners.
- The empty homes programme - this is ongoing and likely to increase in the future.

- The continued increase in Permitted Development Rights, supporting the change of use from a number of uses to residential. The Council has received notification of a number of such proposals and there have now been some units delivered as a result; it is inconceivable that they won't continue to contribute to housing supply.

11.7 There is evidence to suggest a consistent supply of large windfall sites (10 or more dwellings) in the District – with a current average of 53 delivered per annum over the last 13 years. However, in keeping with a cautious approach these **have not** been included in the 5YHLS calculation.

12. Five Year Housing Land Supply Table

Table 2 Wychavon Five Year Housing Land Supply Position at 1 April 2019

| | | per annum |
|--|-------------|-----------|
| Adopted SWDP 2016 target | 10,600 | |
| Completions 2006-2019: | 7,543 | |
| Oversupply (9 years x 442 + 3 years x 578 + 1 years x 407) – 7,543: | 1,424 | |
| Oversupply reduction with Liverpool Approach applied ((1,424 ÷ 11) x 5) | 645 | |
| 5 year target as set out in SWDP3 Table 4b(ii) (5 x 407) minus surplus reduction (645): | 1,390 | |
| 5 year target + 5% | 1,460 | 292 |
| Deliverable planning permissions not started at 1 April 2019 (2,608-971): | 1,637 | |
| Deliverable allocated sites in the adopted SWDP: | 0 | |
| Total deliverable sites not started (1,637 - 5% lapse rate): | 1,555 | |
| Sites with planning permission under construction at 1 April 2019: | 586 | |
| Windfalls 82 x 2: | 164 | |
| Total Supply | 2,305 | |
| Balance against +5 % | 845 | |
| Total years housing supply against +5% | 7.89 | |

12.1 This table brings together all the elements presented in this report to demonstrate Wychavon District's 5YHLS position for 2019-2024 against the annual housing requirement in the adopted SWDP (SWDP3 Table 4b(ii)).

12.2 Wychavon is able to demonstrate that it has **7.89 years** housing supply against the adopted SWDP policy on requirement for affordable and market housing, which excludes a significant element of the oversupply and includes a 5 percent buffer.

13. Maintaining the Housing Land Supply into 2020

13.1 Looking ahead, the 5YHLS position is very likely to remain robust and strong. A significant number of large sites have already commenced, with this year seeing another substantial number of dwellings under construction (586) just below the record at April 2017 (653). The number of sites with planning permission remains high and some large allocations are about to get permission; these sites will begin to deliver homes over the next few years and will maintain the supply for years to come. The Council has continued to approve a number of dwellings post April 2019 that are not accounted for in the 5YHLS calculation as they are not on proposed SWDP allocations. Wychavon have continued to adopt a cautious approach and not relied on this component of supply even though it is highly likely these will be delivered within 5 years.

14. Conclusions

14.1 In accordance with the NPPF (Paragraphs 73-76) the Council have identified and updated a supply of deliverable sites sufficient to provide five years worth of housing against the SWDP3 housing requirement even when an additional buffer of 5 percent is applied.

14.2 A substantial amount of work has been undertaken to ensure that the sites included in the calculation are deliverable in line with the definition set out in the NPPF Glossary. Sites have been assessed to ensure they are available, offer a suitable location for development, are viable and have a realistic prospect that housing will be delivered on the site within five years. Where there is clear evidence that a site will not be delivered within five years it has been discounted, this includes when

sites are unviable, where there is no current need for the type of unit, and in the case of some very large sites where the delivery will be phased.

14.3 The Council has not simply relied on its own judgement rather it has engaged in additional consultation with developers, land owners and agents on large sites (10 dwellings or more) to understand their intentions. Where stakeholders have not provided evidence then the authority has been able to use knowledge gained from those that have, and from trends experienced in the District to make an informed judgement as to the likely delivery of a site.

14.4 The Council has also instructed a highly regarded consultancy to critically assess the 5YHLS 2019-2024 position and their comments were incorporated into the final document.

14.5 In conclusion, Wychavon District Council is able to robustly demonstrate in excess of five years housing land supply, 7.89 years against the Plan requirement of 10,600 dwellings (SWDP3, February 2016).