

Wychavon Five Year Housing Land Supply Report

2017

Includes: Position statement at 1 April 2017, 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 2017 to 31 March 2022. 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.

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 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.

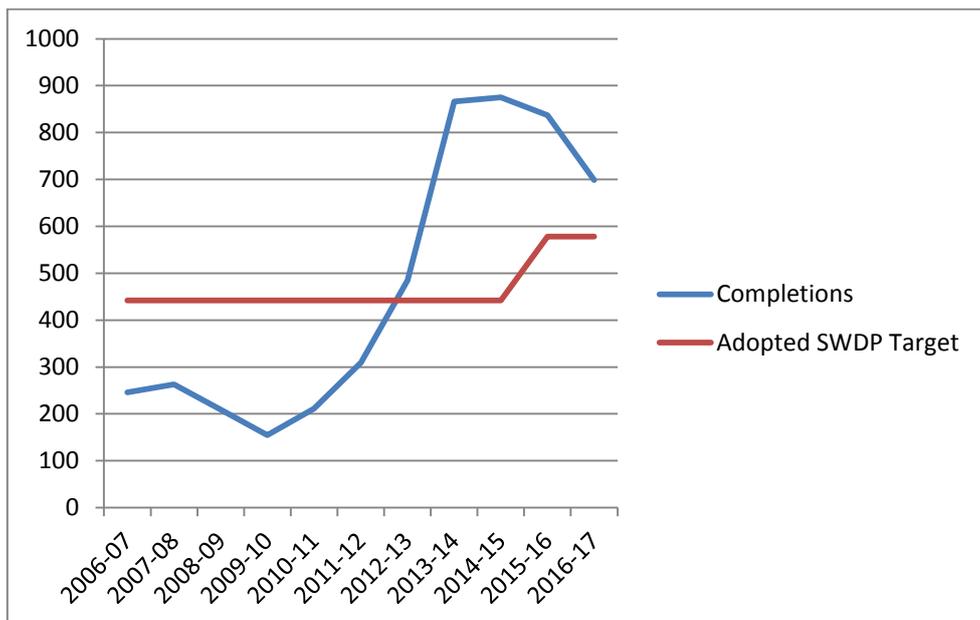
¹ <http://www.swdevelopmentplan.org/?s=Further+Interim+Conclusions>

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 Completions from the outset of the Plan period 1 April 2006 to 31 March 2017 are **5155**; overall this is **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 an all time high of 875 in 2014-15. The three years from 2013-2016 saw a significant improvement in the delivery rates of new dwellings and although completions have dropped slightly in 2016-17 they are still well in excess of the annual requirement; 2016-17 saw **699** completions. 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 council from 1 April 2006- 31 March 2017



4. Calculating Past Under or Over Supply

4.1 In dealing with past delivery any shortfall or oversupply in actual housing supply compared with the annual requirement from 2014 to 2017 has to be calculated. As explained above Wychavon is delivering a surplus of dwellings at this stage in the adopted Plan period.

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 eleven years from 2006-2017 is 9 years at 442 dwellings plus two years of 578 dwellings which equates to 5,134 dwellings. To establish whether there is an under or over supply all completions during this period are taken off this requirement figure.

$$5134 \text{ (Requirement 2006-2017)} - 5155 \text{ (Completions 2006-2017)} = 21 \text{ (surplus)}$$

4.3 Wychavon District Council has worked positively to address the former undersupply and now has a small surplus in supply against the cumulative target. The number of dwellings currently under construction is at an all time high of **653** dwellings; therefore it is likely that this surplus will increase in the next 12 months. To highlight the significant progress made in recent years the shortfall in 2011-12 was 1097 dwellings.

5. Addressing Past Oversupply

5.1 In terms of addressing undersupply the Government's Planning Practice Guidance (PPG ref: Para: 035 ID: 3-035-20140306) endorses an approach that where there is any historic shortfall it is dealt with in the first available five year period. However, in the case of an oversupply, as there is in Wychavon, there is no established approach. Therefore, the Council have taken into account the size of the surplus, which is relatively low (21 dwellings), and have adopted a cautious approach and not deducted this oversupply from the initial five year target. The target remains as it is set out in the SWDP.

$$(1 \text{ year} \times 578) + (4 \text{ years} \times 407) = 2206 \text{ (5 year target)}$$

6. Buffer

6.1 In accordance with the NPPF (paragraph 47) Wychavon is required to test its supply of sites against the housing requirement with an additional buffer to ensure choice and competition in the market for land. Wychavon has delivered well in excess of the annual housing requirement for the last five consecutive years and has eliminated any shortfall against the cumulative target, in fact delivering a small surplus. Therefore, the Council consider it is both appropriate and reasonable to apply a five percent buffer to the five year supply target. A five percent buffer equates to an additional **110** dwellings.

$$2206 \text{ (5 year target)} + 110 \text{ (5\% buffer)} = 2316 \text{ (5 year target with 5\% buffer applied)}$$

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 90% 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 where there has been no start made as at 1st April 2017 and for sites without planning permission developers, promoters and landowners have been engaged to understand their intentions for delivery. 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 evidence to suggest otherwise:

1. On large sites where an application has been submitted but not yet determined 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. This has been reduced to 24 months where an application has been approved subject to a Section 106 agreement; 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 the 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 2017) is set out in Appendix 2.

8.2 Footnote 11 to NPPF Paragraph 47 is clear that all plots that have unexpired planning permissions “should” be included, *“unless there is clear evidence that schemes will not be implemented within 5 years, for example where they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.”*

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 2017 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 developments 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 it's own front door, an indicator of independent living, this will be classified as C3 and therefore contribute towards the 5YHLS. This approach is supported in the National Planning Practice Guidance (NPPG) (Paragraph: 037 Reference ID: 3-037-20140306). At this point in time there are no applications affected by this approach included in the supply calculation.

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 112 dwellings

This scheme has two phases and a third area where there will be a change from 49 restricted holiday use homes to permanent residential use. Phase 1 is well underway with a total capacity of 69 units; 68 are complete and 1 is under construction. Phase 2 has a total capacity of 131 with 19 complete, 47 under construction and 65 not started. Over the last five years 87 units have been completed which suggests an average of 17 dwellings per annum. The owner has invested significantly in the site with 48 plinths already in place (under construction) and with enhanced leisure facilities. The owners also continue to actively advertise. It is reasonable to assume that all those under construction (48) can be delivered in the next 5 years. However, Officers remain cautious with regard to the remainder of the site (i.e. those not started) as these are likely to come forward beyond the five year period. Therefore 114 dwellings are discounted.

114 dwellings discounted.

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

This site is not included in the five year calculation as it is considered undeliverable within five years due to the upfront cost of delivering undercroft parking and the current lack of demand for flatted development in Evesham. Although an extension of time application has recently been approved on 6 June 2016 no additional information has been provided to convince Officers that the site will be delivered in the short term therefore a cautious approach has been taken.

123 dwellings discounted.

15/01418 Land North of Pulley Lane and, Newland Lane, Newland, Droitwich Spa for 250 dwellings

In line with last years assumptions Redrow homes have commenced on site in the last 6 months and at April 2017 there were 3 dwellings complete and 12 under construction. It is anticipated that in all likelihood the site could be completed within 5 years, however Officers have taken a cautious approach and only assumed 40 dwellings per annum in line with council assumptions and Redrow delivery rates in the district.

35 dwellings discounted.

16/02073 Land North of Pulley Lane and, Newland Lane, Newland, Droitwich Spa for 250 dwellings

Taylor Wimpey has Reserved Matters permission for 250 dwellings approved on 15 February 2017. It is anticipated they will make a start on site within 12 months (by April 2018) and will deliver 40 dwellings per annum thereafter. This is a cautious assumption as in the past on very large sites in the District their delivery has been significantly higher than this. 90 dwellings has been discounted from the 5 Year supply.

90 dwellings discounted.

10/02896 Land between Roman Way and Copcut Lane, Salwarpe, Worcestershire for 273 dwellings

This site originally had outline for 740 dwellings and it has come forward in multiple phases, there are 273 dwellings that are yet to have reserved matters permission. It is anticipated that a third developer will get on board with this site as there are already two developers currently building on site. However, in adopting a cautious approach Officers have assumed that the remaining 273 dwellings will not commence until the other phases are complete, therefore completions have only

been assumed from 2021 at a build rate of 40 dwellings per annum. 233 dwellings have been deducted from the supply.

233 dwellings discounted.

13/02538 Raven Hotel, St Andrews Street, Droitwich Spa, for 51 dwellings

The promoter has not provided an update since 2016. This is a conversion of an existing building and is likely to be costly. Although the site has full permission Officers are being cautious and have decided to discount this site from supply until more up to date information can be provided to demonstrate that this site will be delivered within 5 years.

51 dwellings discounted.

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

There has been no response from the promoter of this site. Bringing this site forward could potentially be complex as it requires the demolition of sheds and buildings that are likely to have tenants or be on leases that would require notification. Therefore Officers have taken a cautious approach and deducted this site from the five year supply until there is more certainty, for example a developer on board.

14 dwellings discounted.

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

Persimmon homes have submitted two Reserved Matters applications for 114 dwellings in total (16/00222/RM and 16/01618/RM) which have yet to be determined. Although the developer has indicated that the site will start to be delivered in 2019 there are issues regarding connectivity to the adjacent land, and an HSE objection to the gas pipeline both of which could delay the site being brought forward. Due to the uncertainty around this site Officers have been cautious and discounted the whole site from the five year calculation until there is evidence to demonstrate otherwise.

380 dwellings discounted.

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

Persimmon has built out Phase 1 (except for 1 dwelling) and Phase 2 is well underway. This permission is now considered to be Phase 3 and is likely to commence once the others have been

completed. Officers have assumed a cautious 40 dwellings per annum for Phase 2 so completions are not likely to be seen on this part of the site (phase 3) until 2021, when again it assumed 40 dwellings will be completed per annum. Therefore Officers have adopted a cautious approach and discounted 136 dwellings.

136 dwellings discounted.

14/00308 Worcestershire Hunt Kennels, Kennels Lane, Fernhill Heath for 86 dwellings

Full planning permission was granted at appeal on 2 December 2015 for the development of 86 dwellings. The permission was subject to a number of pre-commencement conditions being satisfied and development commencing by 2 June 2017. A number of pre-commencement conditions have not been satisfied, nor is there any evidence that the development has commenced. Consequently it is the view of the Local Planning Authority that there is no longer an extant planning permission for the site and therefore officers have discounted the 86 dwellings.

86 dwellings discounted.

Total number of dwellings with planning permission not started = **4032**

Total number discounted from delivery within next five years = **1262**

4032 - 1262 = 2770

Total number of deliverable dwellings* with planning permission not started = 2770

*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 outlets (house builders) do you envisage? 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 2022? (See Appendix 5 for full 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 The following sites have been included in the 5YHLS calculation as deliverable SWDP sites within five years:

SWDP51/1Cheltenham Road, Evesham

There is currently an outline planning application for up to 460 dwellings (15/02761/OU) which has yet to be determined. The agent has provided the developers (Bloor Homes) latest intentions (June 2017), which sets out delivery from January 2019. Based on Bloor homes delivery rates on similar sized sites in the District the Council has been cautious and assumed that 40 dwellings could be delivered per annum once it is up and running with 20 dwellings completed in 2019/20. Therefore 100 dwellings have been included in the 5 year calculation. **100 dwellings deliverable in five years**

SWDP60/10 Elmley Road Ashton Under Hill

The site was granted outline permission on 31 May 2017 (16/02188/OU) for 14 dwellings. The agent has confirmed the site is being marketed. Allowing 18 months before a start is made on site and given the small number, there is no evidence to suggest that this site is not deliverable within 5 years. therefore the council have included it in the supply. **14 dwellings deliverable in five years**

SWDP60/22 Land adj The Workshops and Uplands Pinvin

No update has been received this year however a planning approval has been granted for up to 40 dwellings on this site on 1 June 2017 (16/01625/OU). Allowing 18 months until January 2019 before a start is made on site Officers have assumed that all 40 dwellings can still be delivered within 5 years, therefore the site has been included in the supply. **40 dwellings deliverable in five years**

Total number of deliverable allocated dwellings* in the adopted SWDP = 154

*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 2017.

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 2016/17 in Wychavon District.

10.3 Summing all the ‘lapsed permitted dwellings’ 2006/07 to 2016/17 and dividing that by the total number of dwellings with outstanding planning permissions over the same period, gives an average lapse rate of 2.40%. 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 2006-2016

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%
Total over 11 years	684	28447	
Average over 11 year period			2.40%

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

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)

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 93 dwellings per annum from 2006 to 2017. 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 2020/21 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 potential impact of the introduction 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.
- Changes to Permitted Development rights in respect of a change of use from B1(office) and B1(c) (light industrial) to residential as well as those that came into effect on 6th April 2014 (from retail and agricultural uses to residential) – the Council has received notification of a number of such proposals and it is inconceivable that they won't contribute to housing supply.

11.7 There is evidence to suggest a consistent supply of large windfall sites (10+ Dwellings) in the district – with a current average of 51 delivered per annum over the last 11 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 2017

		per annum
Adopted SWDP 2016 target	10600	
Completions 2006-2017:	5155	
Oversupply (9 years x 442 + 2 x 578) - 5155:	21	
5 year target excluding undersupply using Inspectors methodology in Proposed Modifications and the Inspector's Report Feb 2016 (1x 578 + 4 x 407):	2206	
5 year target + 5%	2316	463
Planning permissions not started at 1 April 2017: 4032-1176	2770	
Deliverable allocated sites in the adopted SWDP:	154	
Total deliverable sites not started (2924 - 5% lapse rate):	2778	
Sites with planning permission under construction at 1 April 2017.	653	
Windfalls 82 x 2:	164	
Total Supply	3595	
Balance against +5 %	1279	
Total years housing supply against +5%	7.76	

12.1 This table brings together all the elements presented in this report to demonstrate Wychavon District's 5YHLS position for 2017-2022 against the annual housing requirement in the adopted SWDP (SWDP3 Table 4b(ii)).

12.2 Wychavon is able to demonstrate that it has 7.76 years housing supply against the adopted SWDP policy on requirement for affordable and market housing, which excludes the past oversupply and includes a 5 percent buffer.

13. Maintaining the Housing Land Supply into 2018

13.1 Looking ahead the 5YHLS position is very likely to remain robust and strong. A significant number of very large sites have already commenced, with this year seeing a record number of dwellings under construction at April 2017. 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 2017 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 (Paragraph 47 second bullet point) 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 are in accordance with the NPPF footnote 11 and are indeed deliverable. 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 2017-2022 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, 7.76 years against the Plan requirement of 10,600 dwellings (SWDP3, February 2016).