

Matter 3 – Housing Land Need, Requirement and Supply

Hearing Statement

Response on behalf of

Persimmon Homes (West Midlands) Limited

MATTER 3

Introduction

- 1) Harris Lamb Property Consultancy are instructed by Persimmon Homes (West Midlands) Ltd (**PH**) to prepare a response to the Inspector's issues and questions in relation to Matter 2. PH are promoting land at Whitchurch for residential development, the majority of which currently benefits from a draft allocation in the draft Local Plan, with an additional area of land that is currently not allocated. Our representations and comments focus on the spatial strategy, housing land supply and the suitability of the proposed allocation which we cover in our responses to Matters 2, 3 and 24.

The Housing Need

Q1 *In response to previous questions posed by us and discussions at the stage 1 hearing sessions, the Council have provided reasons why they consider the base date of the Plan should remain as 2016 (GC24). We note that the base date of 2016 has been used for the purpose of calculating the requirement for the plan period. Is this correct or should it be when LHN was calculated (2020)? If a base date of 2020 is used how would this affect the housing need, requirement and supply?*

- 1) PH consider that the base date of the plan should be 2020. If a base date of 2020 was used it would reduce the housing requirement by removing 4 years from the Plan Period. Based on the current housing requirement of 31,300 over the plan period of 2016 to 2038, if this was re-set to 2020 it would reduce to 25,609 dwellings.
- 2) The annual housing need would remain unaffected as this has been calculated using the Standard Method.
- 3) The supply would need to be updated to remove completions that had occurred before the base date. Figure 2 of GC50 indicates that the Council delivered 7,183 dwellings between 2016 and 2020 against a target of 5,692, thus representing an oversupply against their needs of 1,491 dwellings. If the base date were rolled forward to 2020 this additional oversupply would be removed from the overall supply. By removing these 4 years of supply the council would be required to identify a further 1,491 dwellings as part of its supply.
- 4) Linked to this is that the end date of the Plan should also be extended to enable a 15 year plan period from the date of adoption. In doing so, the additional housing requirement will need to be added to the overall requirement and further supply

identified to meet this. To allow flexibility for a plan being adopted after March 2025, we consider the plan period should be extended to 2041.

- 5) If the housing requirement decreases as a result of reducing the length of the plan period the Council's objectives of increasing the delivery of family and affordable housing to meet the needs of local communities, support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community, supporting the diversification of the labour force and supporting wider aspirations, including increased economic growth and productivity would be compromised. These objectives were the basis upon which the council sought to uplift the housing requirement above the standard method housing need figure.

Q2 What is the identified affordable housing need?

- 6) No comment

The Housing Requirement

Q1 Is the approach to calculating the housing growth and the housing requirement set out in the Council's Updated Housing and Employment Topic Paper – April 2024 (GC45) of a minimum of 31,300 dwellings over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?

- 7) PH note that the housing requirement set out in the Updated Housing and Employment Topic Paper has used the Standard Method to calculate it. The housing need (the starting point) was then subjected to three alternative potential uplift scenarios above the base line with the preferred option being a 15% uplift to achieve the objectives listed in paragraph 5 above. Of the three scenarios, the preferred option was the highest uplift of the base line so it can be considered positively prepared.

Q2 What provision is made within the Plan to fulfil the identified unmet housing needs of the Black Country and will the Plan's approach be effective in addressing this sustainably within the plan period, in accordance with national policy.

- 8) Provision is made for 1,500 dwellings to meet the needs of the Black Country. This figure has not changed since the Council submitted its Plan in 2021. However, the policy environment in the Black Country has changed since the Local Plan was submitted following the abandonment of the Black Country Core Strategy and the preparation of individual Local Plans for each Black Country authority. Within the last 9 months Dudley, Sandwell and Wolverhampton have all consulted on Preferred Option Local Plans. The size of the shortfall across the three authorities is approximately 28,000 homes. This compares to a 28,239 shortfall at the time the Black Country Plan Preferred Option was published in 2021 which included the shortfall from all 4 Black Country authorities. As Walsall is yet to publish an updated Local Plan the expectation is that the shortfall would be even greater than previously stated. Furthermore, to date no agreement has been reached on how this is to be met. As such, PH reiterate its previous concerns that the 1,500 dwellings that are proposed by the Council will not be sufficient to adequately address unmet needs arising in the Black Country.

Q3 *Has there been significant 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 paragraph 74 of the NPPF?*

9) No comment

Q4 *Regarding paragraph 69 of the Framework, would at least 10% of the housing requirement be from sites no larger than a hectare?*

10) No comment

Q5 *Is the updated housing requirement in the Plan appropriately aligned with forecasts for jobs growth?*

11) No comment

Q6 *What is the requirement for affordable housing and is this likely to meet the identified need?*

12) No comment

The Overall Supply of Housing

Q1 *Paragraph 74 of the Framework says strategic policies should include a trajectory illustrating the expected rate of housing delivery over the Plan period and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Does the Council have an up to date trajectory and if so where can this be found? Is the housing trajectory realistic?*

13) The Council has produced an updated housing trajectory (GC50) which provides a snapshot of the trajectory as of April 2024. It has been updated to reflect the additional housing requirement proposed by the additional work updated earlier in 2024 and as such it can be considered in line with the current housing requirement. However, it does not consider actual delivery rates on specific sites.

Q2 *Is the housing trajectory and information required by the tables appended to our initial questions (ID1) showing the expected rate of delivery of housing land up to date?*

14) Yes, the Council has published a 5 year land supply report utilising the latest monitoring data to 31st March 2024.

Q3 *Should a trajectory illustrating the expected rate of housing delivery over the Plan period be included in the Plan?*

15) Yes, by doing so it would help demonstrate if they are able to meet their housing requirement and ensure a sufficient supply of land.

Q4 *How will the supply and delivery of housing to meet the identified unmet needs of the Black Country be undertaken? Does this need identifying separately in a trajectory i.e. the expected delivery on the sites (BRD030, SHR060 and IRN001), identified to meet the unmet needs on a yearly basis.*

16) No comment

Q5 Does the Plan identify a developable supply and/or broad locations in years 6 – 10 and, where possible, years 11 – 15 necessary to maintain continuity of deliverable supply, including an appropriate buffer for changing circumstances?

17) Yes, at Appendix 7 of the pre-submission Plan. This needs to be updated as the short term sites are identified as being delivered in the period 2020/21 – 2024/25. The Plan would unlikely be adopted before that period has expired. The sites that are currently identified as medium term sites (25/26 – 29/30) will therefore come forward in the short term period following the Plan's adoption.

Q6 The council relies on sites allocated in the SAMDev Plan to meet the overall need as well as to provide a 5 year supply of housing land on adoption of the Plan. What evidence is there to show that these sites will come forward now when they have failed to do so since the SAMDev Plan was adopted in 2015 to cover the period 2006 to 2026.

18) The Council have published GC51 which assesses SAMDev sites and provides an update on each site's current planning status. Those sites that have been completed have been deleted and are not proposed to be carried forward through to the new Plan. This reduces the total number of dwellings on saved allocations from 10,666 dwellings to 7,896 dwellings.

19) The above notwithstanding, these sites are still not included in the emerging plan and consequently will not be subject to proper scrutiny to ensure that the figure of 7,896 dwellings is realistic. We maintain that the allocations rolled forward from the SAMDev should be included in the emerging plan as allocated sites.

Q7 The Council's Housing and Employment Topic Paper (GC45) at Table 10.1 includes SLAA sites as part of the housing land supply. What are these sites and why were they not allocated in the Plan? Are they different to windfall sites?

20) From the SLAA (2018) it appears that SLAA sites are sites that have been submitted and assessed as part of the SLAA process. An assessment is provided by the Council as to the suitability of each of the development and as such the site if considered suitable it is accepted in the SLAA. SLAA sites differ to windfalls in that they have been submitted for consideration whereas the windfalls are not specific sites and are instead just a figure based upon the theoretical capacity and past delivery rates of windfalls in the county beforehand.

Q8 Should windfalls be counted as part of the housing supply for years 1 – 5 and years 11 – 15?

21) Yes, windfalls should be included for years 1 to 5. We note that it is not unusual for a Plan to include a windfall allowance through over the whole plan period. Paragraph 8.35 of GC45 confirms that the recent average annual windfall delivery rate equates to 59% of the total housing delivery in Shropshire. A significant proportion of housing comes forward on windfall sites.

Q9 With regard to paragraph 71 of the Framework, is there compelling evidence that the windfall allowances for large and small sites would represent a reliable

source of housing supply? Does the approach to windfall sites avoid double counting?

- 22) No, SLAA sites that are not allocated have the potential to be classed as windfalls as well. If SLAA sites have been assessed as suitable they should be considered for allocation in the Plan.

Q10 Table 8.5 (page 59) of the Council's Housing and Employment Topic Paper (GC45) contains information described as "Known Significant Potential Windfall Development Opportunities". Can they be classed as "windfalls" if they are already known? Should these sites be allocated in the Plan? How likely are they to come forward during the Plan period as some have had planning permission in the past which has now lapsed?

- 23) No, if they are known about already they cannot be considered windfalls. Whether they can or should be allocated in the Plan is down to whether or not they are deliverable. Such sites should be considered as part of the SLAA process with a view provided as to whether or not they are deliverable. The fact that some of the sites identified have had planning permission previously and have not been built out would highlight that there may be issues with their deliverability and as such it cannot be assumed they are suitable for allocation and will come forward for development.

Q11 How is specialist housing factored into supply?

- 24) No comment

Q12 What flexibility does the Plan provide if some of the larger sites do not come forward to the Council's estimated timescales?

- 25) The Plan does not contain any flexibility should larger sites not come forward. The housing requirement is based on the Standard Method plus a 15% uplift plus the 1,500 dwellings to meet the needs of the Black Country. The 15% uplift is proposed to increase the delivery of affordable housing, specialist housing and assist with achieving economic and job growth ambitions. the uplift is applied to the standard method housing need figure. However, no flexibility allowance or over provision or allocation of additional sites is included in addition to the 15% uplift to achieve other policy objectives. If a flexibility allowance is required then additional sites would need to be allocated in order to allow for this. A 10% flexibility allowance would require an additional 3,100 homes to be identified.

Q13 What are the targets for the provision of affordable housing? What has been achieved in recent years?

- 26) No comment

Q14 Is the type and size of housing provided/planned meeting/likely to meet the needs of the area?

- 27) No comment

Q15 Is there sufficient variety in terms of the location and type of site allocated?

- 28) No comment