

South
Worcestershire
Five Year Housing
Land Supply
Report

2021

Includes: Position statement at 1 April 2021, 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 the South Worcestershire Councils (SWCs; namely Malvern Hills District Council, Worcester City Council and Wychavon District Council) as required by the National Planning Policy Framework (NPPF). It sets out the housing requirement, delivery to-date and identifies deliverable housing sites for the five year period 1 April 2021 to 31 March 2026. The report includes an appropriate in-depth analysis of sites with planning permission and those that are allocations in the adopted South Worcestershire Development Plan (SWDP) to provide additional evidence about deliverability and to ensure that the supply calculation is robust.

1.2 The adoption of the SWDP in February 2016 established, at SWDP3, five separate sub-areas (Malvern Hills, Worcester City, Wychavon, Wider Worcester Area Malvern Hills and Wider Worcester Area Wychavon) for dealing with housing, employment and retail provision, redistributing the requirements according to land availability and natural and environmental constraints. Since the adoption of the SWDP, the SWCs have published five separate 5YHLS Reports on an annual basis (Wider Worcester Area Malvern Hills since 2018/19 as required by SWDP3) against the annual housing requirements detailed in SWDP3.

1.3 The SWDP is now more than five years old. As set out in the NPPF at Paragraph 74, in such circumstances the calculation of the 5YHLS position should be based on the local housing need calculated using the Standard Method rather than any housing requirement adopted in the Local Plan. Given this, a single joint approach to 5YHLS is being adopted by the SWCs from 2021 onwards. Any other approach to 5YHLS in South Worcestershire from 2021 onwards would not be appropriate as it would require the redistribution of either the Standard Method calculation for each Local Authority to the five sub-areas or the supply for each of the five sub-areas back to each Local Authority. It should be noted that it is the intention of the SWDP Review to formally establish a single joint approach to 5YHLS, and that the SWCs are considered as a single entity in the calculation of the Housing Delivery Test, with a 2020 measurement of 157% published in January 2021¹.

¹ <https://www.gov.uk/government/publications/housing-delivery-test-2020-measurement>

2. Housing Requirement

2.1 The SWDP is now more than five years old, having been adopted in February 2016. As set out in the NPPF at Paragraph 74, in such circumstances the calculation of the 5YHLS position should be based on the local housing need calculated using the Standard Method rather than any housing requirement adopted in the Local Plan.

2.2 The Standard Method calculation sets a baseline using the 2014-based household projections and makes an affordability adjustment according to the most recent median workplace-based affordability ratios, setting a cap of 40% above the average annual housing requirement figure set out in the existing policies and adding a 35% uplift to Greater London and the other 19 largest urban centres. The latest Standard Method calculation for the SWCs is 1,283 dwellings per annum, as set out in Table 1 below.

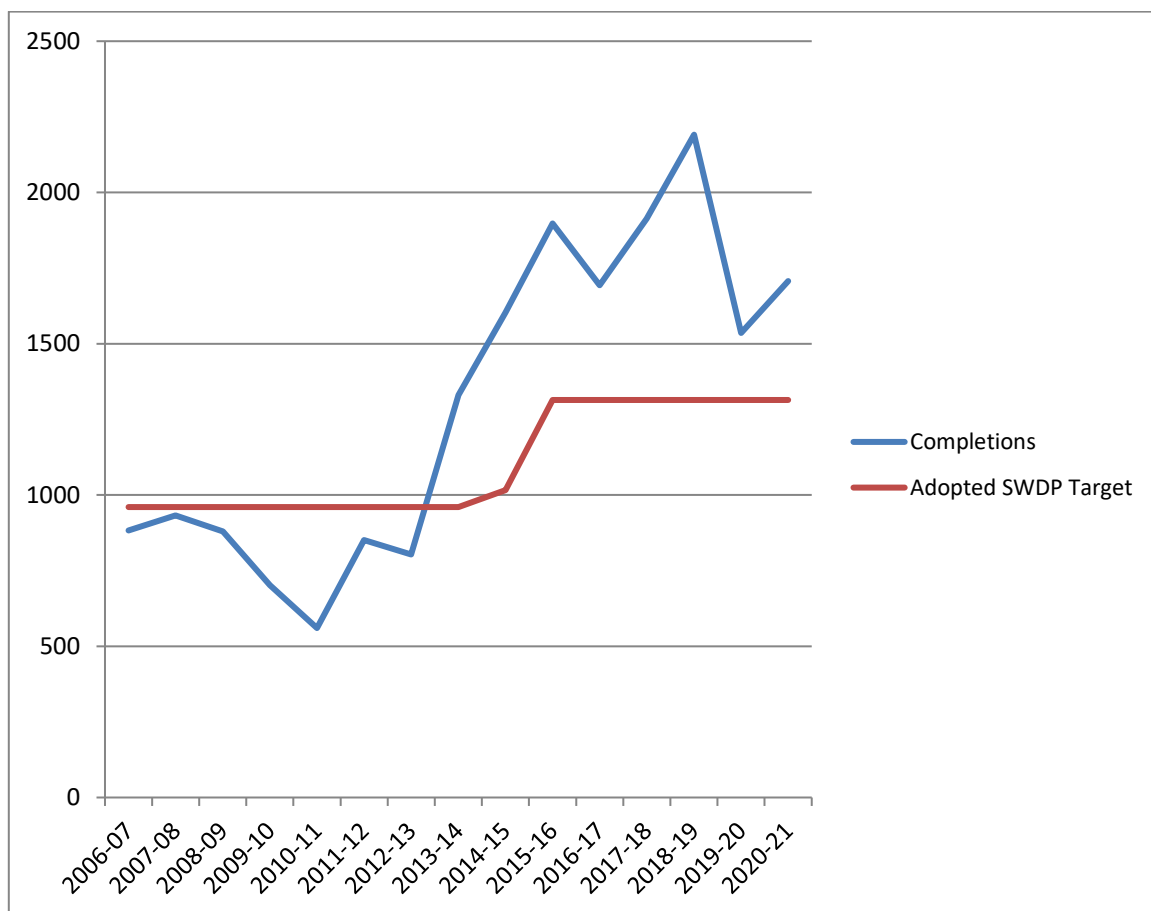
Table 1 - South Worcestershire Councils Standard Method Calculation

	Baseline Need	Affordability Adjustment	Total Annual Dwelling Need
Malvern Hills	278	135	413
Worcester	301	67	368
Wychavon	366	136	502
SWC Total	945	338	1,283

3. Completions

3.1 2020/21 saw total completions across South Worcestershire of **1,719** dwellings. This means that from the outset of the Plan period 1 April 2006 to 31 March 2021 there have been **19,492** total completions across South Worcestershire; overall this is significantly **above** the cumulative annual requirement for completions from 2006 of 16,580. In fact, completions over the last eight years have been well above the annual requirement, with completions from 1 April 2013 to 31 March 2021 totalling 13,882 against a cumulative requirement of 9,860.

Figure 1 - Completions in South Worcestershire from 1 April 2006 - 31 March 2021



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 To establish whether there is an under or over supply, all completions during the period 2006-2021 are taken off the SWDP requirement for the same period.

$$16,580 \text{ (Requirement 2006-2021)} - 19,492 \text{ (Completions 2006-2021)} = 2,912 \text{ (surplus)}$$

4.3 The SWCs have worked positively to address the former undersupply and now has a significant surplus in delivery 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 2012-13 was 1,110 dwellings. 2015-16 saw the first surplus of the Plan period of 430 dwellings; this has significantly increased to 2,912 dwellings in 2020/21. There are some 1,632 dwellings currently under construction, 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 SWCs 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 2,912 dwelling surplus has been divided by the number of years remaining in the plan period (9) and multiplied by five years to establish the number that can be deducted from the five year target. Therefore in this case the SWCs are deducting 1,620 dwellings from the 5 year target.

$$2,912 \text{ (surplus)} \div 9 \text{ (years remaining in plan)} = 324 \text{ (discount per annum from target)}$$

$$324 \text{ (discount per annum from target)} \times 5 \text{ (years)} = 1,620 \text{ (discount from 5 year target)}$$

$$6,415 \text{ (5 years} \times 1,283) - 1,620 \text{ (discount from 5 year target)} = 4,795 \text{ (5 year target taking account of oversupply)}$$

6. Buffer

6.1 In accordance with the NPPF (Paragraph 74), the SWCs are required to test its supply of sites against the housing requirement with an additional buffer. The SWCs latest Housing Delivery Test measurement is 157% (2020, published January 2021), so in accordance with National Planning Practice Guidance, the SWCs consider that the application of a 5% buffer is reasonable and appropriate. A five percent buffer equates to an additional 240 dwellings.

$$4,795 \text{ (5 year target)} + 240 \text{ (5\% buffer)} = 5,035 \text{ (5 year target with 5\% buffer applied)}$$

7. Lead Times and Delivery Rates

7.1 Before explaining the different categories of sites which will deliver housing within the next five years, it is important to set out the approach that has been taken by the SWCs 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. The largest sites are generally being developed by developers who have established delivery trends in South Worcestershire, 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 2021 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 5. The information has been considered in conjunction with local evidence regarding lead in times and delivery rates recently experienced in South Worcestershire 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 SWCs have 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 (N.B. for the avoidance of doubt, in considering sites with planning permission, a distinction has been drawn between those which have full planning permission and large sites which only have outline permission, in accordance with the definition of 'deliverable' set out in the Glossary to the NPPF – see below at Paragraph 8.2). This is considered a cautious approach as it has been demonstrated in South Worcestershire 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. 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. This assumption is 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 South Worcestershire. 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.

7.5 Although the evidence provided demonstrates that, in most cases, development is coming forward 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 2021) 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 number of 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 2021 were sent a Deliverability Questionnaire (Appendix 4). 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 5). In most cases the phasing set out in section 7 of this report has been used in conjunction with local delivery data as many

developers already have a proven track record of delivery in South Worcestershire. 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 Further to the changes to the NPPG, the SWCs has incorporated an element of residential institutions within use class C2. There are a number of planning permissions which are included within the supply as completions and commitments for the 2020/21 monitoring year. In line with the assumption made in the Housing Delivery Test, for C2 extra care units a 1.8 ratio is applied and for C2 student accommodation a 2.5 ratio is applied.

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

Malvern Hills

18/01088 QinetiQ, St Andrews Road, Malvern, WR14 3PS for 347 dwellings

This site is now under construction with 2 dwellings complete and 57 dwellings under construction. 251 dwellings are not started, as is the 66 bed care home (37 units assumed; 66 divided by 1.8). Adopting a cautious delivery rate of 40 dwellings per annum, adding the development of the C2 care home, 237 dwellings are considered deliverable within five years.

51 dwellings discounted.

17/00372 Land North East of Upton Marina, East Waterside, Upton Upon Severn for 70 dwellings

The site has outline planning permission, granted April 2019, for up to 70 dwellings. No response received from the agent, and whilst there is a current variation of condition application pending determination (20/02056/OUT), given the uncertainty surrounding its short-term delivery prospects, in keeping with a cautious approach the Council is discounting this site from the five year calculation.

70 dwellings discounted.

18/01389 Land at (Os 5959 6719), The Oaklands, Tenbury Wells for 35 dwellings

This site has outline planning permission further to the granting of 18/01839/OUT in October 2020. No Deliverability Questionnaire update received and given there is not known to be a housebuilder on board at this stage, this site is excluded from the five year calculation.

35 dwellings discounted.

Total number of dwellings discounted in Malvern = 156

Worcester

P12G0199, 19/00693 & 19/00694 Shrub Hill, Worcester for 520 dwellings

No Deliverability Questionnaire update received. This site has full planning permission for the development of 468 apartments, a 98 bed care home, hotel and car park. Phase 1 is for the construction of 212 apartments and the care home (52 units assumed), which is considered deliverable within five years. Phase 2 is for a further 180 apartments and the car park, with Phase 3 consisting of a further 76 apartments and the hotel; it is likely that these elements will come forward outside of the five year period and thus 256 dwellings are excluded from the five year calculation.

256 dwellings discounted.

20/00249 University Park Development, Bromyard Road, Worcester for 120 dwellings

This site has outline planning permission for the development of up to 120 dwellings. The agent has advised that the sale of the site to a housebuilder is in progress, with work expected to commence on site in May 2022 with all 120 dwellings complete within five years. Given the site only has outline planning permission and a sale to a housebuilder has not been completed, and without further progress in terms of any Reserved Matters applications, in keeping with a cautious approach this site is being discounted from the five year supply calculation.

120 dwellings discounted.

Total number of dwellings discounted in Worcester = 376

Wychavon

96/00596 Leedons Residential Park, Childswickham Road, Broadway for 249 dwellings

73 units have been completed in the last 6 years, an average of 12 per annum. The owner has invested significantly in the site facilities and continues to actively advertise. There are currently 79 plinths in place with 49 not started on a future phase. It is reasonable to assume that some but not all of those under construction will be delivered in the next 5 years given recent delivery rates, and as such only 45 have been included in the supply; this is based on an average of 9 per annum which is the lowest annual completions delivered on site in the last five years. As such, 74 dwellings have been discounted (25 which are under construction and 49 which are not started).

74 dwellings discounted.

18/00549 Land off Boat Lane, Evesham for 200 dwellings

This site has outline planning permission (18/00549/OUT) for the erection of up to 200 dwellings, with current Reserved Matters applications for the highways and drainage works. No Deliverability Questionnaire update received from the agent. Given this and the apparent lack of housebuilder on board at this stage, in keeping with a cautious approach this site is discounted from the five year calculation.

200 dwellings discounted.

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

This site is now well underway, with 97 completions and a further 51 dwellings under construction. In keeping with a cautious approach, delivery of 40 dwellings per annum are assumed, and thus 200 dwellings are considered deliverable within five years.

112 dwellings discounted.

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

This site has full planning permission with 1 dwelling under construction (footings only), however no progress has been made on this site in recent monitoring years. Full commencement on site is dependent on the developer obtaining vacant possession from the current occupier, for which there is currently not a confirmed date. On that basis, although there is likely to be some further

development on the site within the next five years, in keeping with a cautious approach the site has not been included in the five year calculation.

87 dwellings discounted.

16/01618 & 17/01269 Land adjacent to Sims Metals UK (South West) Limited, Long Marston, Pebworth for 380 dwellings

This site is now underway, with 22 completions and a further 15 dwellings under construction. In keeping with a cautious approach, delivery of 56 dwellings per annum are assumed (as there is a developer and Registered Social Landlord on board), and thus 280 dwellings are considered deliverable within five years.

63 dwellings discounted.

15/01036 Land to the West of Station Road including land to the North and West of The Ford House, Station Road, Pershore for 176 dwellings

The site has full planning permission (15/01036/RM) for the erection of 176 dwellings, however there is a current full planning application on the site for the development of 196 dwellings (19/01718/FUL) which was approved by Wychavon's Planning Committee on 6 February 2020 subject to the signing of a Section 106 agreement. The developer has advised that the agreement of the Section 106 is in its final stages, and that work is due to commence on site in July 2021 with 15 completions in 2021/22, 70 completions in each of 2022/23 and 2023/24, and the final 41 completions in 2024/25. Adopting a more cautious approach and assuming delivery of 40 dwellings per annum from 2022/23, 160 dwellings are considered deliverable within five years.

16 dwellings discounted.

16/03029 & 16/03038 Land off Hawthorn Rise, Tibberton for 15 dwellings

Main part of site is wholly complete, however Reserved Matters application for the demolition of the existing village hall and the dwelling is still pending. There is only 1 outstanding dwelling, but given there has been little progress in the last three monitoring years and the new dwellings relies on the demolition of the village hall, in keeping with a cautious approach it is not considered deliverable within five years.

1 dwelling discounted.

Total number of dwellings discounted in Wychavon = 553

WWA Malvern Hills

13/01617, 19/01803 & 21/00539 Land north of Taylors Lane, south of and part north of A4440 Broomhall Way, Worcestershire for 255 dwellings

This site has outline planning permission (13/01617/OUT) for the erection of 255 dwellings, with 36 dwellings having Reserved Matters approval (19/01803/RM) and commenced on site (8 completions and 7 under construction at April 2021) and a further 89 dwellings subject to a current Reserved Matters application pending determination (21/00539/RM). The agent has raised concerns with the time taken to determine s278 applications and suggested that this may impact on the number of dwellings delivered within five years. In assuming a cautious 40 dwellings per annum delivered, 200 dwellings are deemed deliverable within five years.

40 dwellings discounted.

17/00119 Astons Coaches, Clerkenleap, Bath Road, Broomhall, Worcester for 84 dwellings

This planning permission expired in April 2021, with no Reserved Matters applications received for determination. Whilst there is potential for the granting of a new planning permission and development to take place on the site within five years, given the uncertainty it is excluded from the five year calculation.

84 dwellings discounted.

16/01168 Land At (Os8202 5595 West Of Worcester), North of Oldbury Road and South of Martley Road, Lower Broadheath for 1,400 dwellings

This site has outline planning permission (16/01168/OUT) for the erection of up to 1,400 dwellings. Whilst there are no current Reserved Matters applications pending determination, there is a housebuilder on board. As such, delivery is likely within five years. Assuming 18 months before first completions and the delivery of 40 dwellings per annum, 140 dwellings are considered deliverable within five years.

1,260 dwellings discounted.

16/01454 Land North of Oldbury Road, Worcester for 616 dwellings

This site has outline planning permission (16/01454/OUT) for a mixed use development to include student accommodation totalling 1,540 student rooms (616 units assume). The agent has advised that there are no firm plans to deliver on this site at this stage. Given this uncertainty and apparent lack of developer on board at this stage, in keeping with a cautious approach the site is being excluded from the five year calculation.

616 dwellings discounted.

20/01038 Land at (Os 8209 5440), Bromyard Road, Crown East for 150 dwellings

This site has outline planning permission (20/01038/OUT) for the erection of 150 dwellings, with a current Reserved Matters application (21/00901/RM) pending determination. The developer has advised that work is due to commence on site in September 2021, with 30 completions in 2021/22 and 60 completions in each of 2022/23 and 2023/24. Assuming a more cautious 18 months until first completion and a more conservative 40 dwellings per annum delivery rate, 140 dwellings are considered deliverable within five years.

10 dwellings discounted.

15/01419, 21/00709 & 21/00912 Land At (Os8202 5595 West Of Worcester), Martley Road, Lower Broadheath for 965 dwellings

This site has outline planning permission (15/01419/OUT) for the erection of up to 965 dwellings, with two current Reserved Matters applications (21/00709/RM and 21/00912/RM) from two housebuilders totalling 921 dwellings pending determination. The agent acting on behalf of both developers has indicated work will commence on site in October 2021, with 80 completions in 2022/23 and 120 completions per annum in 2023/24, 2024/25 and 2025/26, totalling 440 completions within five years. In assuming a more cautious approach with completions from mid-2022/2023 at a rate of 40 dwellings per annum per outlet, 280 dwellings are considered deliverable within five years.

685 dwellings discounted.

Total number of dwellings discounted in WWA Malvern Hills = 2,695

Total number of dwellings with planning permission not started = **7,697**

Total number discounted from delivery within next five years = **3,780**

$$7,697 - 3,780 = 3,917$$

Total number of deliverable dwellings* with planning permission not started = 3,917

*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 2026? (See Appendix 4 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 considered for inclusion 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 where 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:

SWDP 52* Barracks Store, Court Road, Malvern

This site now has full planning permission for the erection of 33 dwellings further to approval of 19/01298/FUL in April 2021. The agent has advised that work is due to commence on site in July 2021 with all 33 dwellings complete in 2022/23. This is broadly in line with assumptions on commencement and delivery rates, and as such 33 dwellings are included in the five year calculation.

33 dwellings deliverable within five years.

SWDP 59/26 Land north of Woodhall Lane, Ombersley

This site has a current full planning application (20/02916/FUL) for the erection of 45 dwellings, pending determination. The land owner had advised that work is due to commence on site at some point in 2021, depending on the date of the Planning Committee which considers the current planning application, with 30 completions in 2022/23 and 15 completions in 2023/24. Even in assuming a cautious approach of 30 months before first completions, the site is easily deliverable within five; as such, it is included in the five year calculation.

45 dwellings deliverable within five years.

SWDP 60/28 Garage site off A422 and land to the rear, Upton Snodsbury

No Deliverability Questionnaire update received, however the outstanding element of the site was granted full planning permission (20/01348/FUL) for the erection of 13 dwellings in June 2021. Given the size of the site and that this is phase 2 to a development which is under construction, the site is easily deliverable within five years and is included in the calculation.

13 dwellings deliverable within five years.

Total number of deliverable allocated dwellings* in the adopted SWDP = 91

*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.

10.2 Summing all the ‘lapsed permitted dwellings’ from 2006/07 to 2020/21, and dividing that by the total number of dwellings with outstanding planning permissions over the same period, gives an average lapse rate of 3.33%. The lapse rate for 2020/21 was 1.52%. However, in keeping with a cautious approach, a 5% lapse rate has been assumed.

Year of Expiry	Number of Dwellings Expired	Total outstanding Commitments (excludes Local Plan Allocations)	Lapse Rate %
2006/07	34	2,116	1.61%
2007/08	30	2,364	1.27%
2008/09	154	3,458	4.45%
2009/10	166	3,423	4.85%
2010/11	242	3,468	6.98%
2011/12	195	3,688	5.29%
2012/13	172	5,008	3.43%
2013/14	118	5,972	1.98%
2014/15	265	7,958	3.33%
2015/16	85	8,557	0.99%
2016/17	317	8,134	3.90%
2017/18	527	6,687	7.88%
2018/19	154	6,021	2.56%
2019/20	197	7,877	2.50%
2021/21	141	9,329	1.51%
Total over 15 years	2,797	84,060	
Average over 15 year period			3.33%

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 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 7 contains a detailed breakdown of all windfall completions and concludes that small windfalls (9 or less) have been delivered at an average rate of 280 dwellings per annum from 2006/07 to 2020/21. Therefore taking a cautious approach the SWCs has continued to adopt the Inspector’s lower assumption of 180 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 2024/25 onwards.

A total of **360 windfalls** are added to the five year calculation (i.e. 2 x 180)

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:

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)

- The commencement of the Review of the SWDP, with the Submission version consultation scheduled for Autumn 2021 (now delayed; Local Development Scheme in progress of being updated).
- 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.

11.7 There is evidence to suggest a consistent supply of large windfall sites (10 or more dwellings) across South Worcestershire, however in keeping with a cautious approach these have not been included in the 5YHLS calculation.

12. Five Year Housing Land Supply Table

		per annum
Completions 2006-2021:	19,492	
Oversupply (19,492 - 16,580):	2,912	
Oversupply reduction with Liverpool Approach applied ((2,912 ÷ 9) x 5)	1,620	
5 year target using Standard Method output (5 x 1,283) minus surplus reduction (1,620):	4,795	
5 year target + 5%	5,035	1,007
Deliverable planning permissions not started at 1 April 2021:	3,917	
Deliverable allocated sites in the adopted SWDP:	91	
Total deliverable sites not started (4,008 - 5% lapse rate):	3,808	
Sites with planning permission under construction at 1 April 2021:	1,632	
Windfalls 180 x 2:	360	
Total Supply	5,800	
Balance against +5 %	765	
Total years housing supply against +5%	5.76	

12.1 This table brings together all the elements presented in this report to demonstrate the SWCs 5YHLS position for 2021-2026.

12.2 The SWCs are able to demonstrate that it has **5.76 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 2022

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 (1,632). The number of sites with planning permission remains high

and some large allocations will begin to deliver homes over the next few years and will maintain the supply for years to come. The SWCs have continued to approve a number of dwellings post April 2021 that are not accounted for in the 5YHLS calculation as they are not on proposed SWDP allocations; the SWCs 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 74-77) the SWCs have identified and updated a supply of deliverable sites sufficient to provide five years worth of housing against the Standard Method 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 SWCs have not simply relied on their own judgement, rather they have 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 across South Worcestershire to make an informed judgement as to the likely delivery of a site.

14.4 In conclusion, the SWCs are able to robustly demonstrate in excess of five years housing land supply, 5.76 years against the Standard Method housing requirement.