

Home Builders Federation

Matter 6

WAVERELY LOCAL PLAN EXAMINATION

Matter 6: Housing requirements and general supply matters

Issue (i): Are the settlement housing requirements set out in LPP2 underpinned by relevant and up-to-date evidence?

1. With reference to paragraphs 7.1 to 7.5, Tables 2 and 3, and Appendix 11 of the 'Council's response to LPP2 Inspector's Preliminary Matters', and related suggested MMs40, are the housing requirements for the following settlements underpinned by relevant and up-to-date evidence?

- a. Haslemere
- b. Godalming
- c. Witley (including Milford)

No comment.

Issue (ii): Does the LPP2 set out a positively prepared and justified strategy for meeting housing requirements established in LPP1?

1. Is LPP2 based on a clear understanding of the land available in the Borough informed through the preparation of a strategic housing land availability assessment?

The LPP2 has been informed by a strategic housing land availability assessment (SHLAA) however what is not clear from this document, or indeed anywhere in the evidence base, whether the supply of land over the plan period will meet development needs in full, as required in paragraph 11 of the NPPF. Therefore, whilst there may be an understanding of what is available it is not possible for those objecting to the plan to state whether the Plan will ensure housing needs are met in full. In addition, there are inconsistencies in the SHLAA with regard to windfall as well as what the HBF consider to be an overly ambitious assessment as to the expected delivery timescales at Dunsfold that should have been revisited and addressed prior to submission. As such we do



not consider the current SHLAA, and the other evidence on housing land supply, to provide a sufficiently robust evidence base to support the LPP2.

2. Do the site allocations included in the Plan provide an appropriate strategy for meeting housing requirements set out in LPP1 taking into account reasonable alternatives; and has a robust and justified approach to site selection been carried out based on proportionate evidence?

With regard to the first part of this question the answer is no. Firstly, as highlighted above, neither the LPP2 nor its supporting evidence base establishes how many homes will be delivered over the plan period. Without this evidence it is impossible to state whether this plan will provide sufficient land to meet needs and provide a sound basis for delivering the expectations set out in the LPP1. Prior to the hearings the Council must provide a detailed trajectory for the whole plan period setting out what has been delivered and what it expects will be delivered over the remaining plan period.

The latest evidence presented by the Council in CD2 29 indicates that it expects to deliver 8,082 new homes by 2025/26¹. This would leave a further 3,128 new homes to be delivered to ensure needs are met in full. On the basis of the Council's evidence this additional supply will come from:

- 1,350 homes from Dunsfold post 2026;
- 30 from Land Opposite Milford Golf Club post 2026;
- 56 land south of high street Cranleigh post 2026;
- 524 from the allocations in LPP2;
- 250 from allocation SS1 and FNP14J post 2026;
- 50 from post 2026; and
- 669 from windfalls.

This totals 2,929 new homes, some 199 homes short of the amount needed between by the end of the plan period to ensure the Council's housing requirement for the period is met. However, this assessment is based on the expectation that Dunsfold Park will deliver 1,800 homes across the plan period and the windfall assessments from the LPP1, both of which are questionable.

With regard to Dunsfold Park we are concerned that the Council's proposed timescale to the first homes being delivered and the annual delivery rates are overly ambitious. As we set out in our representations Dunsfold Park still does not have a full consent in place and yet the Council expects it to start delivering in 2023/24. Whilst the required SPD supporting the development was adopted in February of this year, we are concerned that at a recent appeal

¹ 3,327 (delivery between 2013/14 to 2020/21) + 4,660 (supply 2021/22 to 2025/26)

(APP/R3650/W/21/3280136) an inspector considered the start date to be unrealistic concluding the development could only optimistically commence in 2025/26. If this was the case, then Dunsfold Park would contribute 1,450 new homes to the overall supply post 2025/26, 350 fewer than estimated by the Council. The impact of this on housing supply are set out in the table below with a significant shortfall in housing supply of 729 homes.

Source of supply	Units delivered
Homes completed 2013 to 2021 (CD2 29)	3,422
Estimated supply 2021/22 to 2025/26 from existing planning permissions (CD2 28 Appendices 2 and 3)	> ten units - 2,927 ² < ten units - 638 3,565
Resolutions to permit (CD2 28 Appendix 5)	5
Windfall estimate for sites of 1 – 4 dwellings (LPP1)	319 (29dpa from 2021 to 2032)
Windfall estimate for sites of 5 or more dwellings (LPP1)	495 (99dpa from 27/28 to 31/32)
New settlement at Dunsfold Aerodrome 2026/27 to 2031/32 (Scotland Lane Appeal)	1,350
Other strategic allocations (SS1 and FNP14J) (CD2 28 Appendix 6)	500
Housing from suitable LAA sites (CD2 28 Appendix 7)	294
Sites in LPP2 (LPP2)	531
Total	10,481
Shortfall	-729

Furthermore, the annual delivery expectations are also ambitious. As referenced in our representations the second edition of Lichfields report Start to Finish outlines that the average annual build-out rate for a scheme of 2,000+ dwellings are 160 dwelling per annum. Whilst we recognise that higher average rates can be delivered it is evident that this is not the norm and as such the Council will need to provide compelling evidence to support their delivery expectations. An average delivery rate of 160 dpa from 2025/26 at Dunsfold Park would see this development deliver around 1,000 homes and increase the shortfall to over a thousand dwellings.

It is also not clear as to what the Council's assumptions are with regard to windfall. As set out above, the LPP1 states in table 6.1 that it expects 39 dwellings each year to come forward on sites of less than 5 units and 99 dwellings each year to on sites of 5 or more from 2027. However, table 2 of the

² 3,327 less 400 from Dunsfold Park on basis of Scotland Lane Appeal

Five-Year Land Supply Assessment estimates the small sites windfall assessment to 29 dwellings per annum. The Council need to be clear as to its expectations and the evidence supporting windfall delivery. The Five-Year Land Supply Assessment also states that no sites are expected to come through windfall on larger sites as these will be allocated in the emerging Local Plan and Neighbourhood Plans. Given that limited time frame remaining for the plan period should it be adopted there is the risk that such allocations will overlap with the Council's larger windfall assessment in in the LPP1 from 2027 and as such we consider that these should be removed from any supply estimates.

Our assessment of the Council's evidence indicates that there could be a significant shortfall in supply and that further allocations in the LPP2 are required to meet the development needs set out in the LPP1. However, without a clear and robust assessment as to expected supply across the plan period it is not possible to state definitively what the level of undersupply may be. The Council needs to provide this evidence to inform the discussions at the relevant hearing sessions and provide the necessary justification to support the approach it has taken.

3. Does the approach to site selection reflect the great weight that should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty (AONB)?

No comment

4. In its response to my preliminary letter the Council set out its views on whether the Plan contained strategic policies and how this relates to site allocations made by LPP2. Other participants are invited to reflect on the contents of the Council's response in framing any responses they might have as to whether the inclusion of individual allocations with the capacity to deliver 100 dwellings or more, which for the purposes of LPP144 are defined as "strategic sites", is consistent with the scope of the LPP2?

No comment

5. The Framework indicates that all plans should consider whether it is appropriate to set out the anticipated rate of development of specific sites – what is the justification for the lack of such information in relation to LPP2's housing allocations?

The Council must provide an updated trajectory for this plan clearly setting out what has been delivered and what is expected to come forward over the remaining plan period. This should include delivery expectations for each of the allocated sites to ensure the effective examination of this local plan and any future monitoring should it be adopted.

Issue (iii) Are other aspects relating to housing supply in Haslemere, Godalming, Milford and Witley justified?

1. Is there compelling evidence that windfall developments would provide a reliable source of supply in the relevant settlements over the plan period - and are the windfall estimates relied on robustly justified?

As set out above the position on windfall across the area is not consistent. The Council will need to provide clear and robust evidence for its assumptions in relation to overall supply and how this relates to the relevant settlements.

2. What is the justification for LPP2's assessment of the contribution of accommodation in the C2 use class towards housing supply, and are figures relating to the provision of C2 bed spaces included in relevant allocations net or gross figures?

No comment

3. LPP1's housing targets are expressed as minimum figures – with this in mind is LPP2's approach to allocations positively prepared, and should the Plan be seeking to allocate sites over and above adopted requirements to provide a degree of headroom?

Yes. The HBF are concerned that the Council has not considered the need to include any flexibility in its supply in order to ensure that housing needs are met in full. As the Council's experiences with Dunsfold Park have shown there is considerable uncertainty as to when developments will come forward and the rate at which they will deliver. As such it is vital that in ensuring the plan is effective and deliverable across the plan period there is a degree of contingency within housing supply. On the basis of the Council's evidence, it would appear that the LPP2 needs to allocate additional sites to ensure needs are met in full. However, as stated above, without greater clarity about delivery beyond 2026 it is not possible to draw firm conclusions at present as to the level of additional delivery required.

4. Some representors make reference to the delivery of housing on the LPP1's strategic sites not progressing at a rate previously anticipated, and comments have been made about potential increases to the Borough's objectively assessed need since the adoption of LPP1. Taking into account the Gladman Development Ltd v Wokingham BC, and Oxted Residential Ltd v Tandridge DC judgements, is it within the scope of the LPP2 to address either of these issues at this time?

Our concern is that this plan does not provide sufficient allocations to ensure the development needs set out in LPP1 are met in full. In preparing two-part local plan the expectation is that as a minimum it will ensure that the needs of the first plan are met. Where expected delivery has been slower on strategic sites identified in the LPP1 it is therefore logical, and fully within its scope, that the LPP2 addresses this through additional allocations that ensure there is sufficient supply to take account of any under supply, delays, and uncertainties.

5. Would the allocation of sites for housing outside of the above-mentioned settlements (i.e in M6,I(i),Q1) be within the scope of LPP2?

Yes. ALP1 sets out the minimum number of homes that are expected to be delivered in each settlement. As such it would be within the scope of the LPP2 to allocate sustainable sites above these figures, but in line with the overall proportions, in order to ensure that development needs are met in full.

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