



Home Builders Federation

Matters 2 and 3

WAVERELY LOCAL PLAN EXAMINATION

Focussed questions for contingency hearings

Matter 2: Housing requirements, supply and allocations

Questions:

2) Do the Council's updated trajectory and related information provide a justified basis for setting out the anticipated rate of development for specific sites (per paragraph 74 of the Framework) by way of appropriate main modifications?

No. As referred to in the hearing on matter 6 we are concerned that the Council continue to overestimate the rate of delivery and level of supply from key sources. The table below provides an update to the HBF's assessment of overall housing land supply in our Matter 6 statement using the Council's updated housing trajectory for the whole plan period. The delivery rates for Dunsfold reflect the position in our hearing statements and the outstanding permissions on sites of 10+ dwellings are based on outstanding completions in Appendix 2 WBC-LPP2-29 otherwise all other assumptions are unaltered. These relatively small adjustments to the trajectory in WBC-LPP2-29 it is evident from the table below that delays to delivery at Dunsfold Park will see the Council fall short of needs by 466 homes and result in a lack of a five-year land supply for the remaining plan period.

As set out at the hearings it is also important to remember that the annual level of delivery expected from Dunsfold Park assumed by the inspector in the Scotland Lane appeal is possible it is by no means certain. There are risks that the level of delivery expected will not be achieved and there is insufficient contingency within the plan to ensure a five-year land supply is maintained and the local plan remain up to date. These risks are set out in the footnotes and would have a significant impact on supply and the deliverability of the plan over its plan period.

Matter 3: Custom and Self-Build Housing

1) Does the Council's evidence relating to the potential supply of self-build or custom-building plots over the plan period justify the approach to this matter as set out in Policy DM36?

The HBF remains concerned that the Council's evidence supporting its policy on self-build does not include the number of plots expected to come through from Dunsfold as and when that comes forward. The SPD states at paragraph 2.41 that there is an

expectation that this site will deliver self-build plots and in combination with windfall may be sufficient to meet the relatively low level of need identified by the Council. The Council must set out how many self-build homes are expected to come forward on Dunsfold Park and from windfall. If this exceeds the identified demand the requirement for 5% of plots on sites of over 20 units to be made available for self-build be deleted.

Appendix 1: Adjusted trajectory.

	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	Total	
Completions	143	242	342	321	602	475	602	695	828												4,250
Outstanding permissions 1 to 9										101	101	101	101	100							504
Outstanding permission 10+										716	343	312	454	426	69	40	40	40	40		2,480
Sites with resolution to permit													3	39							42
LPP1														60	60	60	60	60	20		320
NDP Allocations															132	115	105	70			422
Emerging NDP allocations¹															81	7	21	37	36		182
Other sites²													12	38	10	64				10	134
Windfall <5													72	72	72	72	72	72	72	72	504
Windfall >5																					0
LPP2 allocations												39	78	84	65	40	63	77	20		466
LAA with settlement										7	7	7	7	7	7	7	7	7	3		66
LAA outside settlement/ rural PDL													2	2	2	2	2	2	2	2	14
Dunsfold Park³													50	160	200	200	250	250	250		1,360
Total	143	242	342	321	602	475	602	695	828	824	451	459	779	988	698	607	620	615	453		10,744

¹ Whilst included it must be noted that these have not been examined or adopted and as such their inclusion is questionable.

² No evidence appears to be provided as deliverability and will be required to support their inclusion.

³ As in our statement these estimates are based on the Scotland Lane Appeal (APP/R3650/W/21/3280136) and are significantly higher than average delivery rates from similar schemes outlined in Start to Finish (Lichfields, 2020) of 160 dpa. The same report also notes that average delivery rates per outlet on sites with three outlets of 45 dpa, significantly lower than the 68 dpa per outlet identified by the Council in their latest trajectory. Whilst the range in the report indicates 68 dpa per outlet is possible this must be seen as an optimistic estimate.

5-year Housing Land Supply	2.66	3.07	3.50	3.92	4.50	4.78	4.63	4.39	4.49	4.79	4.71	4.73	4.71	4.53	4.12					
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