

Stage 9

Response to EX224, EX224A and EX224B

WHBC Stepped Housing Trajectory and Target Housing Supply

Prepared by Aurora Properties Limited

Submitted - 11 February 2021

EX224, EX224A and EX224B

Introduction:

1. The Inspector has requested the Council to provide a Housing Trajectory and full details of its five-year housing supply. If a stepped trajectory is proposed, a full justification for that position is also required.
2. The Council is now advancing a Housing Target of just 13,377 dwellings in EX224A. This is against the expert advice of Turley and against its own planning officers' advice.
3. These representations to the Stage 9 Hearing Session estimate that the WHBC Housing Target contained in EX224A is over-estimating housing delivery by 1,141 dwellings. The Housing Target in EX224A should therefore be reduced to 12,234.
4. In 2018, the ONS published updated household projections which caused WHBC to explore the opportunity to reduce its FOAHN. That matter has been covered in Aurora's and Alan Perkins' submissions to EX203 and EX203A and EX215-EX218. The conclusion of those submissions was that (i) the 2018 household projections is not a meaningful change in Welwyn Hatfield, (ii) there is no evidence to support a reduced FOAHN in WHBC (in fact the opposite is true) and (iii) the Examination is too advanced to suffer yet more delay.
5. Subsequent to the submission of representations in respect of EX203 and EX203A and EX215-EX218, the Government has made clear that it does not support the use of the 2018 household projections because it requires stability in meeting its primary commitment to (i) significantly boost the supply of housing and (ii) to deliver at least 300,000 dwellings per annum by the mid-2020s. Those Councils which fail to meet their housing need or delay the adoption of a sound Plan are a burden to those clear commitments.
6. In 2012 the NPPF came into effect which required local planning authorities to properly assess their full OAN, to meet that need in full and to significantly boost the supply of housing.

7. Since 2012, WHBC has railed against Government policy and it failed to submit a Local Plan which is sound, or to take any positive steps to make the submitted Plan sound.
8. In addition to the consequential delay and cost, such conduct is in direct conflict with NPPF paragraphs 14, 47 and 182, which requires the Council to meet objectively assessed needs in full (with flexibility), to significantly boost the supply of housing, to maintain a five-year housing land supply and to act positively, justifiably, effectively and to be consistent with national policy and guidance. None of those tests have been met by WHBC.
9. Documents EX224 and EX224A and EX224B contain details of WHBC's Five-Year Housing Requirement and an assumed trajectory for the delivery of homes over the Plan period. However, as set out below, the assumptions that the Council has used in these documents includes an over-representation of potential housing numbers from a number of sources.
10. It is evident that the Council's approach meets only the minimum requirements of the five-year housing land supply, it is not aspirational or positive in its approach to meeting the borough's OAN, and does not place the Council in a comfortable position to achieve this level of delivery in the first five years of the Plan period.
11. The inconsistencies in the presentation of housing numbers contained within EX224 and EX224A require clarification or correction in order to confirm whether the Council can demonstrate a five-year supply of housing land without the need to allocate additional sites which have been found to be suitable, available and deliverable in the Council's HELAA and to be reasonable alternatives (in most cases more sustainable alternatives) in the Sustainability Appraisal.
12. There are no grounds for a stepped housing trajectory. Any shortfall in housing delivery, particularly during the first five years, is entirely self-inflicted by the Council through its failure to allocate the most suitable, sustainable and deliverable sites in the borough. This is despite advice from its own planning officers that suitable additional site allocations would meet the objectively assessed housing need (16,000) in full and would provide a five-year housing land supply.

EX224A – Table 1

13. Appendix 1: Table 1 in EX224A states an Annual Housing Target of 668 dpa (13,360 over the Plan period). The Housing Trajectory then includes large chunks of housing (2,121 “Completions” and 961 “Commitments”) which are not adequately evidenced or justified (i.e. Completions of Small Sites less than 10 dwellings and Commitments of Small Sites less than 5 dwellings), as required by NPPF paragraph 159.
14. Furthermore, the Housing Target of just 13,360 dwellings includes speculative housing land supply which fails to comply with NPPF paragraph 47 - sub-notes 11 and 12. It also appears to include C2 accommodation, double-counting of replacement dwellings, expired planning permissions and land which is subject to restrictive covenants. Student accommodation (dwelling equivalents) also appears to be over-estimated or misrepresented.
15. On 17 November 2020, the planning officers submitted a report to CPPP which set out its Housing Land Supply (Table 5 in that report) with a total Housing Target of 13,457 dwellings, which was subsequently corrected to 13,277 dwellings (due to double-counting).

Table 5 – Report to CPPP on 17 November 2020

Supply	Dwellings
Completions 2016-2020	2,121
Commitments	1,141
Windfall	1,402
Small sites	24
Sites that remain from Submitted Local Plan	6,161
Sites and capacity identified in proposed changes consultation (not including PB1)	1,887
Additions to sites based on inspector’s interim report	50
Increase in capacity proposed by promoters in response to consultation	671
Total	13,457

Note: “Commitments” was reduced at the CPPP meeting from 1,141 to 961 due to double-counting.

16. In the absence of sufficient detail from the Council, Aurora sought to assess the WHBC housing land supply based on (i) the officer report to CPPP on 17 November 2020 and (ii) Appendix 1 Table 1 in the Housing Trajectory at EX224A:

Table A

Supply	
Completions 2016 – 2020 (Increased from 1,057 [+1,064] in submitted Plan)	2,121
Commitments (Reduced from 1,518 [-557] in submitted Plan)	961
Windfall (increased from 1,315 [+87] in submitted Plan)	1,402
Small Sites	15
Sites that remain from submitted Local Plan	6,161
Total	10,660

Table B

Proposed Additional Site Allocations (Urban)	
Han40a (Town Centre North WGC)	250
Pea106 (73-83 Bridge Road East)	235
Pea103 (29 Broadwater Road)	128
Pea102 (Bio Park Broadwater Road)	250
Pea104 (YMCA Peatree Lane)	15
Pea105 (61 Bridge Road)	21
Hol23 (Hollybush Lane)	16
Pea97 (Norton Building)	122
HC11 (Meridian House)	11
HE17 (Link Drive - Site F)	80
HC08 (Lemsford Road - Site H)	32
HSW92 (Minster Court)	49
HSW94 (College Lane)	115
Total	1,324

Table C

Proposed Additional Site Allocations (Green Belt)	
WeG1 (51 Welham Manor, Welham Green)	16
WeG3a (Land south of Welham Manor)	68
WeG10 (Dixons Hill Road, Welham Green)	120
BrP1 (Upper Bell Lane, Bell Bar)	104
LHe4/5 (Studlands, Little Heath)	36
WE100 (51-53 Woolmer Road, Woolmer Green)	34
Total	378

Table D

Increased Capacity/Density	Submitted Plan	Increased Capacity/Density	Total
SDS1/WGC4/4A	725	90	815
SDS3/Pea02b	850	1,153	2,003
SDS5/Hat1	1,650	100 (See Note 2 Below)	1,750
SDS7/WeG4b	80	20	100
MUS2/HC100b	66	5	71
MUS3/HW100	87	53	140
HS2/WGC1	290	10	300
HS9/HE80	61	15	86
HS20/Wel3	7	2	9
HS27/Cuf1	30	30	60
HS28/Cuf6	108	13	121
Total	3,954	1,491	5,455

Note 1: Increase in Capacity/Density of allocated sites = 38%

Note 2: It is believed that the 100 dwelling discrepancy between the Report to CPPP on 17 November 2020 (13,277 dwellings) and the Housing Trajectory in EX224A (13,377 dwellings) is caused by an increase in the proposed density of SDS5/HAT1 by 100 dwellings which has been added subsequent to the CPPP meeting.

Table E

Reduced or Deleted Capacity	Submitted Plan	Reduced Capacity	Total
SDS2/WGC5 (Birchall Garden Suburb)	1200	600	-600
HS1/Pan01b (Bericot Way, WGC)	28	21	-7
HS6/Han91 (Gosling Stadium)	250	100	-150
HS10/HS31 (Garages, Hollyfield)	14	12	-2
HS26/(No2) (Ridgeway, Cuffley)	8	5	-3
Total	1,500	738	-762

Table F - Summary

Supply	10,660
Proposed New Additional Site Allocations (Urban)	1,324
Proposed New Additional Site Allocations (Green Belt)	378
Proposed Increase in Capacity/Density	1,491
Traveller Sites HS32 and HS35	18
Reduced or Deleted Capacity	-762
Total	13,109

17. There is a discrepancy of -268 dwellings (13,377 – 13,109) between the WHBC Housing Trajectory and the Aurora analysis. 100 of that discrepancy is identified in Note 2 at Table D, being the simple addition of 100 dwellings on SDS5/Hat1 (without any explanation). This leaves an unexplained discrepancy of -168 dwellings. It is probable that this discrepancy is contained in Table A above where the Council has stated that 6,161 dwellings would be delivered from sites that remain allocated in the submitted Local Plan. However, this cannot be investigated/verified because no schedule of those dwellings was provided to the CPPP meeting on 17 November 2020 or to this Examination.

18. It is a matter of concern that the Council is promoting a significant increase in capacity/density on sites which are contained in the submission Plan. This undermines the evidence base at the point of submission. The substance and reliability of this significant increase in capacity/density should require justification at the Examination.
19. The Council has not provided any detail or analysis of housing mix or housing distribution. However, it appears that the majority of housing is one and two bedroom flats in a narrow and concentrated geographical area. This clearly does not meet the tests in NPPF paragraphs 14, 47, 50, 158 and 159. This is amplified by the Council's Annual Monitoring Report (AMR) for 2019-2020 which states at paragraph 5.14;

"A high proportion of studios and flats, which accounted for 94% of gross completions this year was behind the increase in density."

20. The failure by WHBC at the November 2020 Council meetings to recognise even the minimum OAN assessed by Turley (14,300) or to allocate sufficient sites to meet its unsubstantiated OAN (13,800) is simply the latest episode in this Council's apparent confrontation with Government policy, causing yet further delay and cost.
21. Consequent to the recommendation from CPPP to full Council on 17 November 2020, Aurora submitted a Freedom of Information (FOI) request to WHBC requesting a detailed breakdown of the sites which will meet the WHBC Housing Target of 13,277.
22. On 17 December 2020 WHBC responded to the FOI request with various schedules, which Aurora has sought to assess. The outcome of that assessment is listed below.

C2 Accommodation:

23. Whilst acknowledging the MHCLG publication in July 2018, which contains advice in respect of equivalent dwellings for C2 and student accommodation, this is an Examination into the submitted Plan and its evidence base.
24. In the Turley SHMA 2014, it makes clear at paragraph 20 of the Executive Summary:

*“The household projections developed by Edge Analytics exclude the population within communal establishments. Analysis of the projected change in this element of the population suggests a future additional need for approximately 620 bed spaces for persons aged 75+ who are likely to require care home (C2) accommodation (2011 – 2031). **This sits outside of the OAN and needs to be accounted for accordingly when comparing against the future supply of housing.**”*

25. Turley repeat its emphasis in Section 9 at paragraph 9.102:

*“There is also a need for older persons housing – in the form of C2 accommodation – which falls outside of the population and household modelling presented in section 6 and above. **This therefore falls outside of the objectively assessed need, and should be considered in addition to this figure.**”*

26. Turley conclude its 2014 SHMA advice in respect of C2 accommodation in Section 10, at paragraph 10.49:

*“The population and household growth projection scenarios include a calculation of projected change in the communal population, with a relatively consistent level of growth in the population across all scenarios. This relates solely to the population aged 75 and over, and it is therefore reasonable to assume that this primarily relates to an increased need for care home accommodation. **This need is not included within the household projections, and therefore should be considered in addition to the objectively assessed need presented in this report.** Based on the Economy Study (Baseline) scenario on which the objectively assessed need is based, this suggests a total growth in the communal population of approximately 620 people (2011 – 2031), with this growth to be accommodated within C2 accommodation.”*

27. The Turley SHMA update in 2017 (upon which the OAN of 800 dwellings per annum is founded) revised its OAN for C2 bed-spaces down from 620 in the 2014 SHMA to 339 in its 2017 update. Turley stated at paragraph 24:

*“The modelling indicates that growth in the older population will generate **a separate and additional need** for 339 bed-spaces in communal establishments (Use Class C2) **which is excluded from the overall OAN...**”*

28. The Turley OAN for 339 C2 bed-spaces during the Plan period is clearly in addition to the housing FOAHN (800dpa). Equally, Policy SP2 requires 330 C2 bed-spaces within the Plan, in addition to the market and affordable housing need.
29. Consequently, the Council has erroneously included 232 Use Class C2 bed-spaces as “dwellings” in its Housing Target. The C2 accommodation erroneously included within the WHBC Housing Target is:

Completions:

Land at Bericot Way Welwyn Garden City (N6/2014/2462)	42 bed-spaces
Former QEII Hospital (6/2015/2132)	35 bed-spaces

	77 bed-spaces

Commitments:

Adjacent 45 Broadwater Road Welwyn Garden City(6/2018/3292)	58 bed-spaces
Minster House Hatfield (6/2019/2086)	49 bed-spaces
Plot 6000 Hatfield Business Park (6/2017/0550)	45 bed-spaces
Oakridge Lodge Welwyn Garden City (6/2020/0826)	3 bed-spaces

	155 bed-spaces
Total	232 bed spaces

Student Accommodation:

30. The submitted Local Plan states at paragraph 9.27:

“In accordance with national planning guidance, the provision of student accommodation may be counted towards the number of completed dwellings based on the amount of accommodation it releases in the housing market. For monitoring purposes, this is calculated using a cautious 5:1 ratio between student bedrooms and dwelling equivalents based on an average of 4.5 bedrooms per house in multiple occupation, which has received planning permission in the borough in recent years.”

31. The submitted Plan therefore contains a “need” which has been assessed objectively, based on the evidence of previous planning permissions. Paragraph 47 of the NPPF requires the Council to use its evidence base to ensure that their Local Plan meets its full objectively assessed needs. Paragraph 158 requires a Local Plan to be based on adequate, up-to-date and relevant evidence that take full account of relevant market and economic signals. The evidence presented by the Council in its own submission Plan is that 5:1 is the relevant ratio between student bedrooms and dwelling equivalents.

32. Paragraph 5.14 in the Council latest AMR states in respect of student accommodation at the Comet Hotel;

“In particular, there were 272 student completions at the Comet in Hatfield, which were self-contained studios and had a very high net density.”

33. The designation of these student bedrooms as individual dwellings clearly requires greater scrutiny.

Comet Hotel, Hatfield:

34. Planning permission S6/2016/1739 (Comet Hotel Hatfield) is described as:

“EXTENSION AND REFURBISHMENT OF THE GRADE II LISTED BUILDING (USE CLASS C1) FOLLOWING DEMOLITION OF EXISTING REAR AND SIDE EXTENSIONS. ERECTION OF 7,253.75QM STUDENT ACCOMMODATION (SUI GENERIS), LANDSCAPING AND ASSOCIATED WORKS”

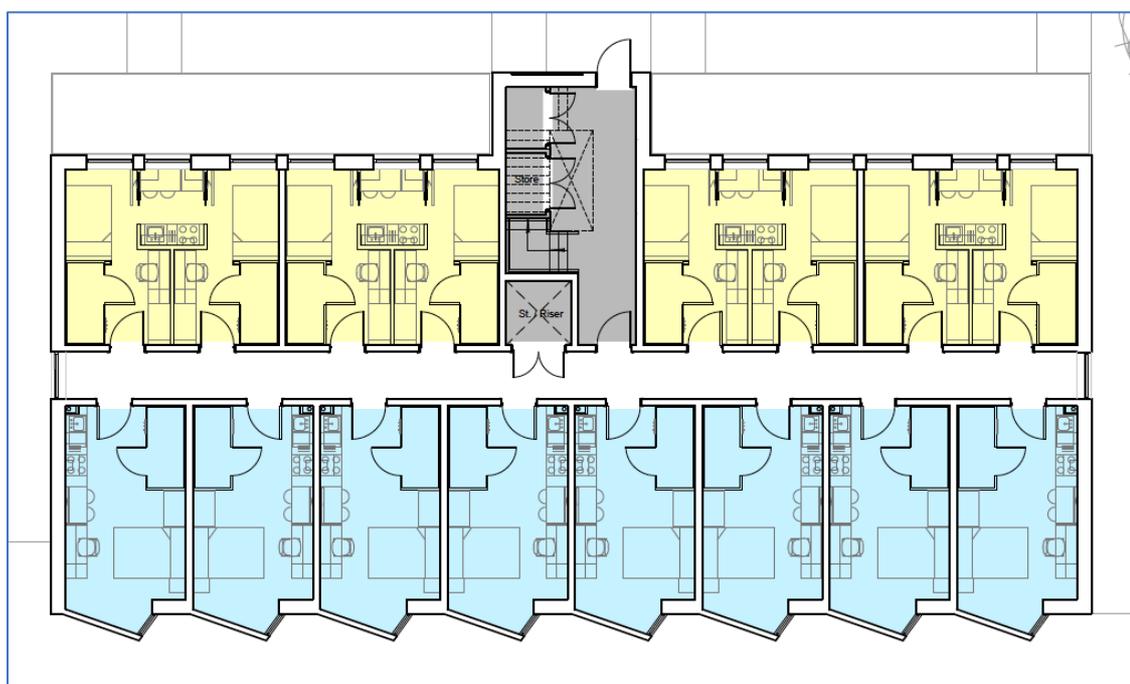
35. The applicant’s planning statement describes the development as:

“56 bedroom aparthotel supported by a high quality communal facilities including a bar, dining room and a ‘business hub’ and 308 beds of high quality, managed student accommodation.”

36. The Council’s AMR states at paragraph 5.4;

“The high number of completions this year was largely due to the completion of the student accommodation at the former Comet hotel site. As this accommodation is self-contained studio flats they are counted as individual dwellings and not dwelling equivalents.”

37. A typical example of the student bedrooms, comprising one-bedroom and two-bedroom units (the latter sharing certain facilities), are contained in the planning application plans (see typical plan overleaf):



Project				
HOTEL AND STUDENT RESIDENTIAL COMET HOTEL SITE HATFIELD				
Drawing Title				
PROPOSED STUDENT RESIDENTIAL GROUND FLOOR PLAN				
Drawn	Checked	Paper Size	Scale	Date
NB	ML	A1	1:200	SEPT 2015
Project No.	Drawing No.		Revision	
14286	0301		D	

38. The 308 purpose built “managed” student accommodation bedrooms permitted by planning permission 6/2016/1739 (Sui-Generis) cannot reasonably be counted as individual dwellings. The one bedroom accommodations are approximately 18m² and

the twin rooms are approximately 29m² (14.5m² per person). They should only be counted towards the borough’s Housing Target in accordance with draft Policy SP7 and the supporting text at paragraph 9.27 of the submitted Plan. The Council is presently counting 272 of these student bedrooms as individual (C3) dwellings in “Completions” for the period 2019/2020. The schedule at EX224B – Appendix 2 does not appear to contain the balance (36) of these student bedrooms.

- 39. The inclusion of student bedrooms in the Council’s Housing Trajectory should be at a ratio of 5:1 (equivalent to 54/62 dwellings) based on the policies contained in the submitted Plan.

College Lane, Hatfield:

- 40. Under “Completions 2016/17” planning permission S6/2012/1928 (College Lane Hatfield) provides for 324 (C3) equivalent dwellings. The Planning Officer Report describes this development as:

“DEMOLITION OF EXISTING STUDENT RESIDENCES COMPRISING 1059 BEDSPACE (ROBERS WAY, BUTLER HALL, FERN HALL, CHAPMAN HALL, BROAD HALL AND COALES HALL). ERECTION OF 2511 NEW STUDENT BEDROOMS”

- 41. The net increase in student accommodation is therefore 1,452 bedrooms, which is the equivalent of 290 dwellings (not 324 dwellings) when the ratio of 5:1 contained in Policy SP7 is applied.

Summary of Student Accommodation:

- 42. The Council’s Housing Target (as Resolved at the Council Meeting on 23 November 2020) contains:

M S6/2016/1739 (Comet Hotel Hatfield)	272 dwelling equivalents
S6/2012/1928 (College Lane Hatfield)	324 dwelling equivalents

Total	596 dwelling equivalents

43. The correct presentation of student accommodation (equivalent dwellings) should be:

S6/2016/1739 (Comet Hotel Hatfield)	62 dwelling equivalents
S6/2012/1928 (College Lane Hatfield)	290 dwelling equivalents

Total	352 dwelling equivalents

44. Assuming the Inspector is willing to find Policy SP7 to be sound, the total student dwelling equivalent in the Council’s Housing Target should be reduced from 596 to 352 (a reduction of 244) in the Housing Target.

Duplications and Double-Counting:

45. In reply to the FOI request, the Council has provided Aurora with a schedule of “Commitments”, being those developments which have been granted planning permission but not yet completed. Assessment of that schedule has revealed potential double-counting, particularly where an existing dwelling is being replaced, but the Council does not appear, in all cases, to have deducted the dwelling(s) to be demolished.

46. As a consequence, the following deductions, which total 37 dwellings, should be made to the Housing Target:

WHBC over-presentation of commitments of 5 or more dwellings = 14 dwellings

WHBC over-presentation of commitments of 5 or less dwellings = 23 dwellings*

*including 1 duplication

47. The Council has also provided Aurora with a schedule of “Completions” on sites of 10 dwellings or more. That schedule contains an additional 16 replacement dwellings which appear to be double-counted.

48. As a result of the above assessment, it appears that the Council is double-counting 53 replacement dwellings (37 commitments and 16 completions) in its Housing Target.

Restrictive Covenants:

49. Restrictive covenants which limit or prevent development are not a material consideration for the planning authority when determining a planning application. However, a restrictive covenant which prevents the implementation of a planning permission (deliverability) is a material consideration under paragraph 47 - sub-notes 11 and 12 of the NPPF 2012 (particularly where those dwellings are included within the five-year land supply).
50. There are two planning permissions which are included within the Council’s Housing Target (EX224B - Commitments at 30 September 2020) where restrictive covenants currently prevent the implementation of those developments, with no certainty of delivery during the Plan period:

11 Brookmans Avenue Brookmans Park 6/2016/1778	5 dwellings
77 Brookmans Avenue Brookmans Park 6/2018/1996	7 dwellings

Total	12 dwellings

Expired Planning Permissions:

51. From the FOI reply from WHBC to Aurora, it appears that “Small Sites” for 189 dwellings (in the schedule of “Commitments”) contain a number of planning permissions granted in the period 2012 to 2016, which have now expired. From the information provided by the Council, it is not possible to establish the validity of these historic planning permissions to the present Housing Target. Therefore, unless development has commenced (extant permission) or the planning permission has been renewed, any non-implementations should be deducted from the “Commitments”. A detailed schedule of these Small Sites would assist the Examination.

Outstanding Information:

52. For the period 2016 to 2020, the Council states that 271 dwellings on sites of ten or less were completed. However, it has not yet been possible to examine these planning permissions to establish the net increase in dwellings. As the “Commitments” on small sites has revealed possible double-counting of replacement dwellings, it is reasonable

53. to assume that the same situation might have been repeated in respect of “Completed” dwellings on small sites.

Increased Density:

54. The Council has recently sought to advance SDS3/Pea02b (Broadwater Road West – Wheat Quarter) for 2,003 dwellings which is an additional 1,203 dwellings above the dwellings in the submitted Plan Housing Trajectory (800 dwellings). It is noted that planning permission has been granted to increase the density on this site from 800 to 1,403 dwellings. However, there is no evidence at this Examination to support a further increase from 1,403 dwellings to 2,003 dwellings in high-rise, high-density flats. Indeed, it is highly probable that there would be strong objections from Historic England, The Gascoyne Cecil Estate (Hatfield House) and the Welwyn Society.
55. Such a high-rise, high-density development is likely to cause harm to the setting of Grade I and Grade II Listed Buildings and to the adjoining Conservation Area. It would also be out of character with the existing Garden City. The speculative delivery of an additional 600 dwellings on SDS4 (Pea02b) does not meet the test in NPPF paragraph 47 (sub-notes 11 and 12). Equally, the suggested delivery of these 2,003 flats over the period 2022/23 to 2029/30 (8 years) would require an average of 250 dwellings per annum which is an optimistic assertion, to say the least, especially having regard to several other major developments of one and two bedroom flats which are proposed within the same narrow local area. The risk of future phases being delayed by market conditions is significant. Furthermore, this would simply exacerbate the uneven housing mix and constrained housing distribution within the borough.

Conclusion to EX224A Table 1:

56. The FOI response to Aurora has revealed significant issues with the Housing Target which include:
1. Over-presentation of C2 accommodation (as C3) = 232 dwellings
 2. Over-estimation of student dwelling equivalents (as C3) = 244 dwellings

3. Double-counting of planning permission commitments = 37 dwellings
4. Double-counting of completions = 16 dwellings
5. Undeliverable dwellings due to restrictive covenants = 12 dwellings
6. Over-statement due to speculative increased density at SDS3/Pea02b = 600

WHBC Total over-statement of Housing Target Delivery = 1,141 dwellings

57. The Council's Housing Target, as contained in EX224A at 13,377 should therefore be reduced to 12,236 dwellings.
58. The Housing Target does not contain any target for C2 bed-spaces. Policy SP2 requires 330 bed-spaces, which is in addition to the Turley FOAHN at 800dpa.
59. It is also a material consideration that the majority of the over-presentation or over-estimation of housing delivery will have the greatest negative impact during the first five-years of the Plan period.
60. The Housing Trajectory does not appear to include any allowance for non-implementation.
61. The Council's Housing Target and its Housing Trajectory of 13,377 dwellings is not based on robust evidence and it is not supported by the Council's own expert consultants.
62. Using an annual Housing Target of 800 dpa, the Council is failing to achieve a five-year housing land supply, without identifying any significant and demonstrable adverse impacts which outweigh the benefits of doing so.

EX224A – Table 2

63. EX224A Table 2 seeks to present an increase in the Housing Target from 13,377 (from Table 1) to 16,389. As such, the representations and deficiencies identified in respect of Table 1 are equally relevant to Table 2.
64. Table 2 contains a speculative proposal to safeguard "PB1" for 700 dwellings. Even if there was any prospect of including PB1 as safeguarded land, it would not be appropriate to include safeguarded land in the Housing Target or the Trajectory. Such

land is intended to meet longer-term development needs stretching well beyond the plan period, and only then incorporated following a Local Plan review.

65. Table 2 also contains HS29/Cuf2, HS30/Cuf7, HS22/BrP4 and HS24/BrP7. The Council has made clear that these sites should now be deleted from the submitted Plan because, based on evidence procured subsequent to submission (LUC Green Belt review), the Council now recognises that these sites make the submitted Plan unsound. Whilst the deletion of these sites requires agreement from the Inspector, it would be perverse to leave these unsuitable sites in the Plan when there are alternative sites that are more suitable and more sustainable, with less harm to the Green Belt, which the Council has not allocated. These four allocated sites should be deleted.
66. Table 2 also includes SDS6, Symondshyde, with an increased capacity from 1,130 in the submitted Plan to 1,500 (+370) in Table 2. The Inspector has made very clear, on several occasions, that Symondshyde should only be considered for allocation after suitable and sustainable housing sites adjacent to the existing excluded villages have been allocated in advance of Symondshyde. However, the Council has failed to list those sites which are all capable of providing a significant contribution towards housing delivery within the first five-years of the Plan period. Until that evidence is presented to the Examination, Table 2 in EX224A and EX224B is incomplete.

Conclusion

67. Whilst the current examination operates in the context of the NPPF 2012, the Local Plan review in five years' time will be considered in the context of the NPPF 2019 (or updated national policies at that time). Therefore the result of the standard methodology (presently 875 dpa) is relevant and will become more relevant at the first Local Plan review. It is consequently in the interest of the Council to achieve a position now which comfortably achieves a five-year housing land supply in anticipation of that requirement.
68. In January 2020, the Council's planning officers prepared a detailed 700 page report with a clear recommendation, submitted to the CPPP meetings on 23 and 29 January

2020, to allocate sufficient suitable and sustainable sites to meet the OAN of 16,000 dwellings in full. The latest report to CPPP on 17 November 2020 indicates that due to increased density on some urban sites, it would be possible to deliver more than 16,000 homes in the Plan period. This would provide headroom (flexibility) in the Plan which is a clear objective of NPPF (2012) paragraph 14 and, importantly, meet the OAN.

69. The Council is also required to ensure that housing distribution and housing mix meets all housing needs within the borough. Most recently, the Government has emphasised the need for family homes. However, it is apparent from (i) a review of the information submitted to the CPPP meeting on 17 November 2020, (ii) the recently published WHBC AMR and (iii) the recent response from WHBC to a FOI request that the submitted Plan is weighted heavily in favour of one and two-bedroom flats, which are predominantly concentrated in a narrow geographic and demographic area. That is not a sound strategy and the Council should be required to publish full details of its proposed housing mix and housing distribution.

Alan W D Perkins FRICS

11 February 2021