

Your Ref:  
Our Ref: RB/BT/1072c

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Dear Mr Kemp

**RESPONSE ON BEHALF OF BARWOOD STRATEGIC DEVELOPMENT SECURITIES IN RELATION TO COUNCIL UPDATES ON TRAJECTORY AND WINDFALL ALLOWANCE**

Dear Sir

This representation has been prepared by HOW Planning on behalf of Barwood Development Securities 'Barwood'. It relates to the following documents, released earlier this week:

- Notes on Updated Trajectory: Matter 3 Statement Appendix 3.3 dated 15th May (EXAM 19)
- Revised Approach to Urban SHLAA Sites and Windfall Allowance dated May 2015 (EXAM 20)

Firstly it is disappointing to only be afforded two days on which to comment on these documents, however it is appreciated that the Inspector wishes to issue his findings imminently. The representation is therefore somewhat briefer than it might otherwise have been and should be read in conjunction with previously submitted Hearing Statements.

**Trajectory**

I would again remind the Inspector of the Council's poor record at forecasting completions. I disagree strongly with the comments of Mr Leader at the Examination in Public (EIP) that the exercise undertaken for purposes of forward forecasting in Annual Monitoring Reports (AMRs) is completely different from the current process and should not be seen to undermine the Council's track record or current capabilities. The two are closely related and I maintain that significant doubt generally can be cast on the Council's ability to accurately forecast future housing completions. To briefly recap, officers have consistently (by a margin in excess of 25%) overestimated completions for a number of years.

Given the above it is concerning to see:

- windfall allowance is too high (a point expanded on below)
- sites with no current planning permissions (in some instances without even an application) are forecast to start delivering completions from 2015/16
- assumptions are clearly being made regarding the number of house builders which might build single sites, when at this stage no agreements are in place (estimates of close to 200 completions per year in some instances)

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It is clear therefore that there remains significant doubt on the robustness of the trajectory set out by the Council.

### **Urban SHLAA Sites and Windfall Allowance**

The key points made by many parties at the EiP in objection to windfall allowance clearly remain pertinent here. The council continues to rely heavily on past completions without providing any clear evidence which would give the confidence necessary to consider that there is any sort of realistic prospect of the level of windfalls anticipated actually coming forward. Windfalls are, incredibly, included in the first five years of the Plan which in my experience the majority of local planning authorities avoid, as sites coming forward for completion should primarily be those through newly identified, allocated sites.

I can see no robust evidence to suggest that the council can be sure it will be able to rely on windfall allowance to the extent it predicts, indeed paragraph 14 in the paper (EXAM 20) refers to 'a degree of confidence'. This is not a robust position, failing to meet the relevant tests in Framework and Guidance.

I suggest Option 3b, Identifying Additional Site Allocations is clearly the only sensible option which should be pursued.

### **Level of Housing Growth**

EXAM 20 updates the Council's Housing Trajectory, which has been submitted to the EiP as Appendix 3.3 to the Council's Matter 3 Hearing Statement. The Council, as directed by the Inspector, has updated Appendix 3.3 in three respects. These are set out at paragraph 1 of EXAM 20.

The Council's updated Appendix 3.3 identifies the sources of supply and categorises anticipated completions into three five year periods between 2015/16 and 2019/20. The total housing land identified equates to 12,886 units, inclusive of completions since 2011. Draft Policy DS6: Level of Housing Growth identifies the Council will provide for 12,860 new homes between 2011 and 2029. As such, it is considered that the Council has not provided sufficient flexibility to allow for sites not coming forward within the Plan period. Furthermore, the Council's housing land supply is heavily dependent on an allowance for windfall sites, which equates to almost 20% of the identified supply.

Barwood does not consider that the Plan is positively prepared as, fundamentally, it is vehemently contested that the Council has met objectively assessed development needs. Furthermore, draft Policy DS6 does not provide for sufficient flexibility to deliver even the Council's proclaimed level of housing growth. It is crucial that this is addressed at the outset.

Please confirm safe receipt.

Yours sincerely



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