

Housing Implementation Strategy

January 2015 (Amended)

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1. Introduction

- 1.1 The Housing Implementation Strategy for Stratford-on-Avon District sets out the Council's approach to managing the delivery of new housing in the District to 2031. It supports the Core Strategy, which sets out how, where and when new development will be provided to meet the development needs of Stratford-on-Avon District.
- 1.2 The National Planning Policy Framework (NPPF) sets out the requirements that local planning authorities must meet in preparing their Local Plans/Core Strategies:
- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
 - *identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;*
 - *identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.*
- 1.3 To assist with the above, Local Planning Authorities are obliged to prepare a Housing Implementation Strategy (HIS) for both market and affordable housing. The purpose of the HIS is to illustrate how Local Planning Authorities 'will maintain delivery of a 5 year supply of housing land to meet their housing target' (NPPF, para.47).

2. Housing Requirement

- 2.1 The Core Strategy proposes a housing target/requirement of 11,300 homes for the 20 year period 1 April 2011 to 31 March 2031. This equates to an average of 565 dwellings per annum. For Stratford-on-Avon District, the housing requirement is the same as its objectively assessed housing needs.
- 2.2 Figure 1 summarises the position in respect of the housing requirement as of 30 September 2014. When account is taken of the number of homes already built since the start of the plan period in April 2011, the number of homes currently with planning permission, the Core Strategy strategic allocations, and the number of homes to be allocated through the accompanying Site Allocations Plan, the housing requirement of 11,300 is slightly exceeded. Thus, the Council is seeking to meet its housing requirement in full.
- 2.3 The Core Strategy only identifies and allocates strategic sites for development. Non-strategic sites will be identified in the Site Allocations Plan (currently in preparation and scheduled for adoption in Autumn 2016). To provide further 'headroom', the Site Allocations Plan will also allocate 'contingent sites' that would be brought forward as appropriate to provide flexibility and ensure that the housing requirement is delivered and that a continuous 5 year supply of housing is maintained as required by the NPPF (see Section 5 below).
- 2.4 Given the nature of the District, an allowance for 'windfalls' is included to meet the housing requirement. Windfalls are those unidentified sites that unexpectedly come forward for development such as conversions and changes of use which are generally difficult to identify in advance. The windfall allowance is for small sites (1-4 homes) only (see Section 4 below).
- 2.5 The housing requirement represents the net number of additional homes to be provided. Homes are defined as permanent self-contained dwellings. Whilst it can include mobile homes, it excludes

homes for Gypsies and Travellers whose needs are planned for through a separate Gypsy and Traveller requirement. The housing requirement does include 'extra care' housing for elderly people, irrespective of use-class, provided they are self-contained units of accommodation. Specialised accommodation that provides bed spaces (e.g. nursing homes) is not included in the housing requirement.

Figure 1: Summary of Housing Requirement (as of 30 Sept 2014)

Core Strategy Requirement	11,300
Completions (i.e. built 1 April 2011 – 31 March 2014)	739
<i>Residual</i>	10,561
Commitments	4,750
Commitments - Strategic Allocations @ Alcester & Southam	751
<i>Residual</i>	5,060
Strategic Allocation – Gaydon Lighthorne Heath	2,500
Strategic Allocation – Canal Quarter Regeneration Zone	650
Small Sites Windfall Allowance (i.e. 27pa)	405
<i>Residual 'To-find'</i>	1,505
'To-find' Stratford-on-Avon	0
'To-find' Main Rural Centres	537
'To-find' Local Service Villages	1,043
Balance (+/-)	+75

3. Housing Trajectory

- 3.1 The housing trajectory as of 30 September 2014 sets out the projected supply of housing in the Core Strategy for the 20 year plan period 2011 to 2031. It is shown in graphic form in Figure 2a and tabular form in Figure 2b. Figure 2c shows how the requirement is distributed across the settlement hierarchy.
- 3.2 In the 3 years since the start of the plan period on 1 April 2011 there have been 739 completions. It is acknowledged that this is under of the requirement for the same period of 1,695. However, this low level of delivery is not unexpected: firstly, it is a consequence of retrofitting a higher annual target to previous years (i.e. 565); secondly, and more importantly, it is a reflection of the effects of a housing moratorium which severely restricted the granting of planning permissions and therefore construction of new homes¹; and thirdly, it reflects the effects of the economic recession which impacted upon the delivery of housing. The downwards direction of the managed delivery target (as shown by the dashed line which reaches zero before the end of the plan period in Figure 2a) is because of the slight overprovision in housing supply.

¹ The housing moratorium was agreed by the Government Office for the West Midlands. It was operational between 2006 and 2011. However, because it applied to planning permissions and not the construction of homes, its effects were felt after the end of the moratorium in 2011/12 and 2012/13.

Figure 2a: Housing Trajectory Graph

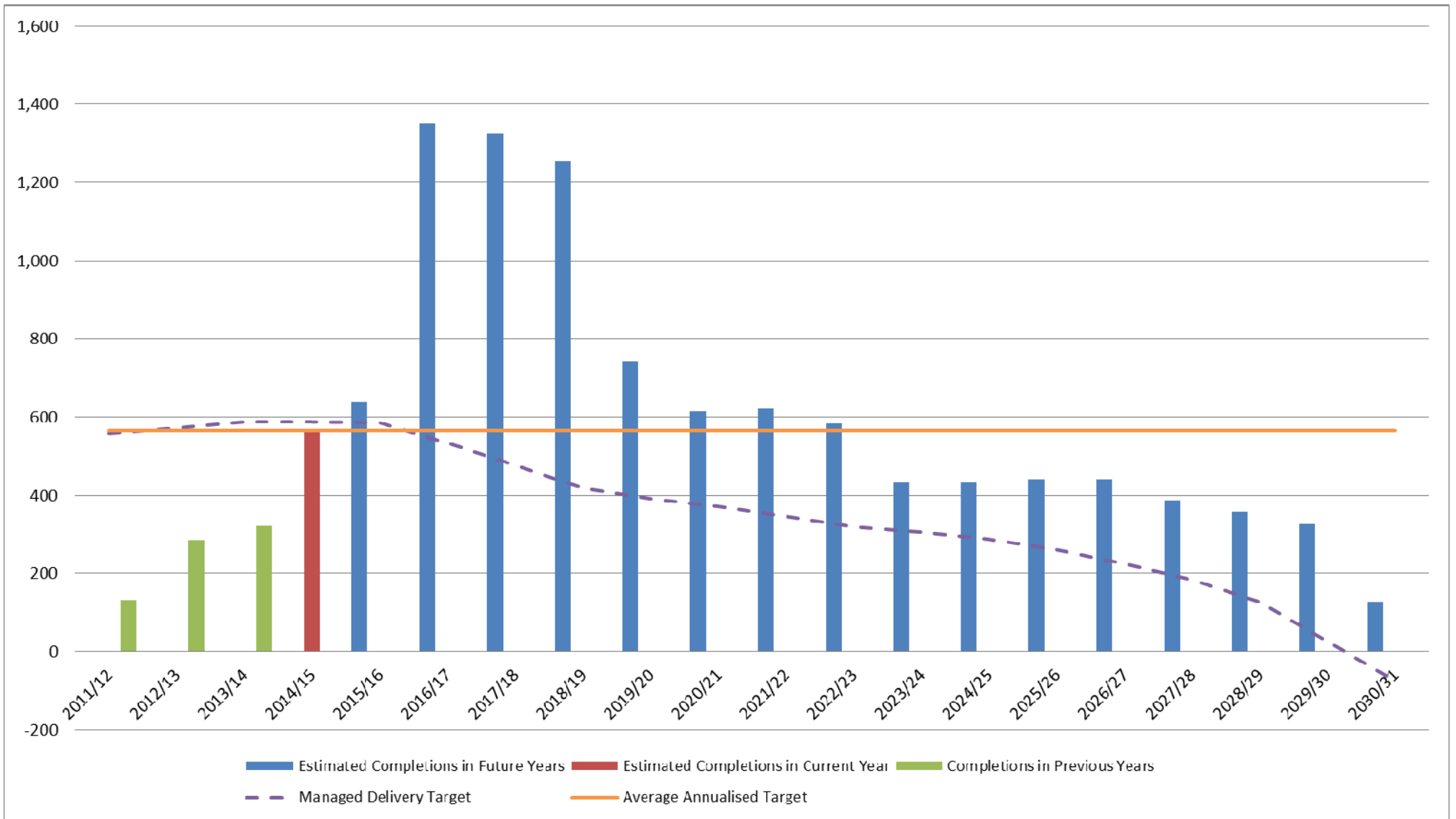


Figure 2b: Annualised Housing Trajectory Table

For the plan period 1 April 2011 to 31 March 2031		Phase 1					Phase 2					Phase 3					Phase 4				
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
Site	Net	2011 /12	2012 /13	2013 /14	2014 /15	2015 /16	2016 /17	2017 /18	2018 /19	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31
Planning Consents (Small Sites)	674	23	44	74	86	95	290	53	5	4											
Planning Consents (Medium Sites)	839	7	80	89	149	110	184	103	95	22											
Planning Consents (Large Sites)	1,027	47	47	14	25	118	135	340	301												
Planning Consents (Other Super Sites)	282	56	114	91	21																
Cattle Market, Stratford-upon-Avon	214						54	54	54	52											
Ettington Road, Wellesbourne	225				39	46	96*	44													
Former Norgren Works, Shipston-on-Stour	101						21	40	40												
Friday Furlong, Bidford-on-Avon	169				28	39	71	31													
Harbury Cement Works, Bishop's Itchington	200							20	30	50	50	50									
Kinwarton Farm Road	119			48	39	32															
Maudslay Park	179				40	10	23	40	66*												
Meon Vale - Phase 1 (Long Marston Depot)	284			5	90	80	70	39													
Meon Vale - Phase 2 (Long Marston Depot)	198						20	50	80	48											
Meon Vale - Phase 3 (Long Marston Depot)	18				18																
West of Birmingham Road, Stratford-upon-Avon	160				25	45	45	45													
West of Shottery, Stratford-upon-Avon	800						80	120	120	120	120	120	120								
Sub-Totals	5,489	133	285	321	560	575	1,089	979	791	296	170	170	120	0	0	0	0	0	0	0	0

(Table continues over page)

For the plan period 1 April 2011 to 31 March 2031		Phase 1					Phase 2					Phase 3					Phase 4				
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
Site	Net	2011 /12	2012 /13	2013 /14	2014 /15	2015 /16	2016 /17	2017 /18	2018 /19	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31
Canal Quarter (Warwick House)	80						40	40													
Canal Quarter (Phase 1a, 1b, & 2)	570								20	40	50	70	80	50	50	60	60	60	30		
Gaydon Lighthorne Heath	2,500						25	75	200	200	200	200	200	200	200	200	200	200	200	200	
North of Allimore Lane (Southern) ALC.1	190						40	40	40	40	30										
North of Allimore Lane (Northern) ALC.2	160					40	40	40	40												
West of Banbury Road SOU.1	236					30	42	42	42	40	40										
West of Coventry Road SOU.2	165						40	40	40	45											
Site Allocations Plan - Stratford-upon-Avon	0																				
Site Allocations Plan - Main Rural Centres	537							42	55	55	55	55	55	55	55	55	55				
Site Allocations Plan - Local Service Villages	1,043										43	100	100	100	100	100	100	100	100	100	100
Windfall - Stratford-upon-Avon	75						5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
Windfall - Main Rural Centres	150						10	10	10	10	10	10	10	10	10	10	10	10	10	10	10
Windfall - Rural	180						12	12	12	12	12	12	12	12	12	12	12	12	12	12	12
Sub-Totals	5,886	0	0	0	0	70	254	346	464	447	445	452	462	432	432	442	442	387	357	327	127
District Total	11,375	133	285	321	560	645	1,343	1,325	1,255	743	615	622	582	432	432	442	442	387	357	327	127

Notes

Figures shown are the 'net' number of homes expected

Years shaded show current 5 year period

Small Sites = 1-4 homes; Medium Sites = 5-30 homes; Large Sites = 31-99 homes; Super Sites = 100+ homes

* Delivery includes affordable 'extra care' housing scheme in addition to market homes

Figure 2c: Housing Trajectory Table by Location

Location	Phase 1				Phase 2				Phase 3				Phase 4			Total
	2011/12-2015/16				2016/17-2020/21				2021/22-2025/26				2026/27-2030/31			
	Built	With Permission	Allocated	Sub-Total	With Permission	Allocated	Windfall	Sub-Total	With Permission	Allocated	Windfall	Sub-Total	Allocated	Windfall	Sub-Total	
Stratford-upon-Avon	365	146	0	511	648	0	25	673	0	0	25	25	0	25	25	1,234
Canal Quarter	0	0	0	0	0	190	0	190	0	310	0	310	150	0	150	650
West of Shotton	0	0	0	0	560	0	0	560	240	0	0	240	0	0	0	800
Main Town	365	146	0	511	1,208	190	25	1,423	240	310	25	575	150	25	175	2,684
Alcester	57	75	40*	172	0	310*	0	310	0	0	0	0	0	0	0	482
Bidford-on-Avon	2	113	0	115	160	0	0	160	0	0	0	0	0	0	0	275
Henley-in-Arden	47	19	0	66	0	0	0	0	0	0	0	0	0	0	0	66
Kineton	8	0	0	8	91	0	0	91	0	0	0	0	0	0	0	99
Shipston-on-Stour	66	41	0	107	196	0	0	196	0	0	0	0	0	0	0	303
Southam	-20	81	30*	91	66	371*	0	437	0	0	0	0	0	0	0	528
Studley	20	35	0	55	21	0	0	21	0	0	0	0	0	0	0	76
Wellesbourne	22	124	0	146	248	0	0	248	0	0	0	0	0	0	0	394
MRC Unspecified	0	0	0	0	0	207	50	257	0	275	50	325	55	50	105	687
MRC Total	202	488	70	760	782	888	50	1,720	0	275	50	325	55	50	105	2,910
Local Service Villages	86	240	0	326	601	43	0	644	0	500	0	500	500	0	500	1,970
Lighthorne Heath	0	0	0	0	0	700	0	700	0	1,000	0	1,000	800	0	800	2,500
Large Rural Brownfield	5	188	0	193	457	0	0	457	50	0	0	50	0	0	0	700
Rural Elsewhere	81	73	0	154	277	0	60	337	0	0	60	60	0	60	60	611
Other Rural Locations	86	261	0	347	734	0	60	794	50	0	60	110	0	60	60	1,311
Total	739	1,135	70	1,944	3,325	1,821	135	5,281	290	2,085	135	2,510	1,505	135	1,640	11,375

* Allocated sites ALC.1, ALC.2, SOU.1, & SOU.2 already have planning permission

- 3.3 As can be seen in Figures 2a and 2b, significant provision over the average annualised target is expected in the next 5 years between 2015 and 2019. This partly reflects the need to remedy the undersupply in previous years in the short-term and maintain a 5 year supply of housing, but also reflects likely build-out rates on the high number of 'oven-ready' sites with planning permission. The Council acknowledges that the expected completion rates are high and successful delivery requires commitment from the housebuilding industry to deliver their planning permissions.
- 3.4 Provision in later years is shown to be below the annualised average of 565. This is not a concern in respect of the housing requirement itself because of the anticipated overprovision in the preceding period and the fact that the full housing requirement is being met within the plan period. It should also be noted that because housing supply is continuous, the later years of the current plan period would also be the first years of the new plan period, with its own housing target and newly identified sites. However, it does raise some potential issues in respect of maintaining the 5 year supply of housing as discussed in Section 5 below.

4. Components of Housing Supply

- 4.1 The housing trajectory is comprised of a large number of sites ranging in size from a single house to the strategic allocation at Gaydon Lighthorne Heath for a total of 3,000 homes. It is useful to consider in more detail supply from the larger of these sites as delivery of these will be more critical to ensuring the successful implementation of the housing trajectory.
- 4.2 Assumptions about when sites will be delivered are based on information from site developers and informed professional planning judgement, including analysis of past build-out rates. As a general rule of thumb, in the recovering market it is reasonable to assume that a single sales outlet can achieve an average of 40-50 sales per annum in Stratford-on-Avon District.
- 4.3 Figure 3 sets out build-out rates from a sample of sites across Stratford-on-Avon District. As can be seen, the annual average achieved is 41 dwellings. However, this fails to take into account that on many sites, development only occurs in part of the year. Thus, it is worth considering the average achieved during the actual build period which equates to 53 per annum. The mid-point of these two averages is 47 homes per annum. The assumption of 40-50 homes per annum is therefore considered reasonable.
- 4.4 Figure 3 also shows the speed at which completions are achieved on site with an average of only 14 months between the Council issuing the decision notice for planning permission and the date of the first completion. This reflects the desire of house builders to implement permissions, realise their assets and actually build homes in Stratford-on-Avon District.

Figure 3: Sample Build-out Rates

Site / Location	Homes Total	Decision Date	Start on Site	First Completion	Last Completion	Time to First Completion	Build Period	Completions Per Financial Year			Build Period Yearly Average	Year Annual Average
								1	2	3		
Wattons Lane, Southam	87	14 Sept 2007	24 Sept 2008	3 April 2009	6 May 2011	19 Months	2.08 Years	48	33	6	41.8	29
Egg Packing Station, Stratford-Upon-Avon	77	9 Feb 2010	3 Nov 2010	15 April 2011	24 Aug 2012	14 Months	1.33 Years	56	21	-	57.9	38.5
Kipling Road, Stratford-U-Avon	106	13 May 2011	11 Jan 2012	7 Sept 2012	5 June 2014	16 Months	1.67 Years	33	65	8	63.5	35.3
Kinwarton Farm Road, Alcester*	119	5 Sept 2012	16 Oct 2012	10 May 2013	30 Sept 2014	8 Months	1.33 Years	48	(45)	(26)	52.6	46.7
Meon Vale, Long Marston*	500	4 Dec 2012	4 July 2013	29 Jan 2014	30 Sept 2014	13 Months	1.67 Years	5	(108)	(80)	49.1	54.6
Average Totals						14 Months	1.62 Years	32	54	30	53	41

Notes:

- Figures in brackets are expected completions
- Time to First Completion = Approximate number of months between decision date and date of first completion
- Build Period = Approximate number of years between first and last completion dates
- Build Period Yearly Average = Number of completions divided by build period
- Year Annual Average = completions divided by numbers of years completions occurred.

* Kinwarton Farm Road – site under construction. Cut-off date of 30 Sept 2014 applied to completions. 22 completions achieved in first 6 months of year 2. Build period annual average based on 70 completions in 1.33 years. Annual average = 70 divided by 1.5 years.

* Meon Vale – site under construction. Cut-off date of 30 Sept 2014 applied to completions. 5 completions achieved in year 1, 77 completions achieved in first 6 months of year 2. Build period annual average based on 82 completions in 1.67 years. Annual average = 82 divided by 1.5 years.

- 4.5 As mentioned above, it is useful to consider the supply from larger sites in more detail involving a range of housebuilders contributing to the delivery of housing and the trajectory is not solely dependent on any single site. This reduces the risk of the trajectory not meeting the housing requirement. The majority of sites listed in Figure 4 have planning consent and many of these are currently under construction.
- 4.6 A judgement is also provided as to the relative risk to delivery of each site. This should of course be read in the context of the relatively buoyant housing market of Stratford-on-Avon. Sites under construction are considered to be low-risk. The Cattle Market site, which had previously been listed as ‘stalled’ in the Housing Sites and Completions schedule, can now be considered low risk given that the issues regarding viability have been resolved though the granting of a new planning consent. Sites that have planning consent but where construction has not commenced are shown as having a medium-risk. This includes four proposed Core Strategy allocations. This is not to suggest that development will not happen on these sites, simply that there is less certainty regarding timescales for delivery.
- 4.7 Similarly, two sites are shown as being comparatively higher risk, namely, the proposed Core Strategy strategic allocations at Gaydon Lighthorne Heath and the Canal Quarter Regeneration Zone. The risk assessment reflects the fact that neither site has a current adopted policy status. However, a planning application at Gaydon Lighthorne Heath is expected in 2015 and there are no significant infrastructure impediments to the delivery of this scheme.

Figure 4: Main Components of Housing Supply

Site	Status (as of Sept 14)	Scheme	Timescale	Application Reference	Built (to date)	Developer / Housebuilder	Progress Commentary	Relative Risk
Former Norgren Site, Shipston-on-Stour	Planning Permission Granted	102	2015/16 – 2018/19	14/00101/REM	0	CALA Homes	Variation of consent to deal with SUDs issue. S106 expected 2014/15. 2-2.5 year build-out reasonable and assume full completion within 5 years given overall timescales of development.	Medium
Kinwarton Farm Road, Alcester	Under Construction	119	Immediately (Expected end date 2015/16)	12/02952/REM	70	Redrow Homes (Midlands)	Site under construction. Development in progress with completions already achieved. No reason to suggest delivery not achievable within 5 yrs.	Low – under construction
North of Allimore Lane (Northern Part) (ALC.2)	Outline Planning Permission	160	2015/16 – 2018/19	11/02767/OUT	0	Bloor Homes	Working to discharge conditions including design code / masterplan for whole site. Reserved Matters application expected early 2015. 2 sales outlets. Start onsite 2015. Reasonable to assume vast majority of scheme will be delivered within 5 years.	Medium
West of Birmingham Road, Stratford-upon-Avon	Under Construction	160	Immediately (Expected end date 2017/18)	13/01361/REM	0	Bovis, (Orbit)	Site under construction and being marketed as “Stratford Leys”. Average build out rate of 40dpa assumed with 20 expected by April 2015. Some units already sold off-plan.	Low – under construction
West of Coventry Road (SOU.2)	Resolution to Grant subject to s106 [Outline permission granted Dec 14]	165	2015/16 – 2020/21	13/02947/OUT	0	Taylor Wimpey	Proposed Core Strategy allocation. Resolution to grant outline permission achieved March 2014.S106 expected shortly and Reserved Matters application to follow. Understand that developers want to move quickly on this site. Reasonable to assume completion with 5 years.	Medium
Friday Furlong, Bidford-on-Avon	Under Construction	170	Immediately (Expected end date 2017/18)	13/00251/REM 13/03115/FUL	12	Taylor Wimpey	Site under construction and being marketed. 2 phases. First for 108 is under construction and second for 62 has resolution to grant 20 th April 2014. Both phases now in same developer ownership.	Low – under construction
Maudsaly Park, Great Alne	Under Construction	179	Immediately (Expected end date 2018/19)	12/02571/REM, 13/00710/REM, 13/03061/REM, 12/02231/VARY	0	Renaissance Villages	Site under construction and being marketed. Phase 1 = 50 units, Phase 2 = non-residential, Phase 3 = 61 units, Phase 4 = affordable element 68 units. Completions expected 2014/15.	Low – under construction
North of Allimore Lane (Southern Part) (ALC.1)	Outline Planning Permission	190	2015/16 – 2019/20	11/02895/OUT	0	Gallagher	Working to discharge conditions including design code / masterplan for whole site. RM expected later 2014/15. 40 units pa from a single outlet considered reasonable. Reasonable to assume vast majority of scheme will be delivered within 5 years.	Medium
Harbury Cement Works, Bishop’s Itchington	Outline Planning Permission	200	2018/19 – 2023/24	13/03177/OUT		St Francis Group	Given nature of site, and outline consent, reasonable to assume that not all units will be delivered within next 5 years. Remediation expected Q3 2015 to Q3 2016 and Reserved Matters application by end of 2016. Start on site 2017. Single outlet from Q4 2017. Expected completion Q4 2021.	Medium

Site	Status (as of Sept 14)	Scheme	Timescale	Application Reference	Built (to date)	Developer / Housebuilder	Progress Commentary	Relative Risk
Alcester Road Cattle Market	Under Construction	214	Immediately (Expected end date 2019/20)	13/00157/FUL	0	Redrow Homes (Midlands)	Site under construction - highway works implemented. Viability issues resolved by new permission that increased overall number of units and decreased affordable housing contribution.	Low – under construction
East of Ettington Road, Wellesbourne	Under Construction	175 C3 homes + 50 self-contained C2 homes	Immediately (Expected end date 2017/18)	13/00428/REM (C3) & 13/01314/REM (C2)	29	Charles Church	Site under construction and part-occupied. Marketed as “Ettington Park”. Council tax registrations since June 2014.	Low – under construction
West of Banbury Road (SOU.1)	Resolution to Grant subject to s106	236 homes + replacement sports facilities & employment	2015/16 – 2020/21	13/00809/FUL	0	Bloor Homes	S106 expected Jan 15. Start on site April 15. 36 completions expected by June 16. 40-45 units achievable per annum.	Medium
Long Marston Storage Depot (Meon Vale)	Under Construction	500 homes + community facilities	Immediately (Expected end date 2019/20)	12/02404/REM 12/00484/VARY 13/00476/REM	82	Persimmon, Charles Church, St Modwen, (Orbit)	Site under construction and part occupied. Marketed as Marston Grange (Persimmon) and Meon View (Charles Church). It is noted that the two housebuilders are the separate arms of the same company. However, they target different market sectors and can be treated as separate outlets each capable of achieving 40-50 sales per annum.	Low – under construction
Canal Quarter Regeneration Zone (SUA.1)	Proposed Allocation	650 homes (1,011 in total). Mixed use. Associated development of 2 greenfield employment sites.	2016/17 - 2020/21 = 160 2021/22 - 2025/26 = 280 2026/27 – 2030/31 = 210	14/03338/FUL	0	Landowner led (ABD Developments & Orbit Group)	Discussions between the Council and key landowners and occupiers are ongoing. Application for 82 flats on Warwick House has been submitted. No reason to assume whole site will not progress as expected given commitment to do so following adoption of the Core Strategy.	High

Site	Status (as of Sept 14)	Scheme	Timescale	Application Reference	Built (to date)	Developer / Housebuilder	Progress Commentary	Relative Risk
West of Shottery, Stratford-upon-Avon	Outline Planning Permission	Up to 800 homes + Stratford Western Relief Road	2015/16 – 2021/22	09/02196/OUT	0	Bloor Homes	Outline consent granted on appeal October 2012. Work underway to discharge conditions including now approved Design Code, archaeology assessments and highway drawings. Submission of Reserved Matters application expected by end of 2014. Outstanding issue with land ownership and the western relief road, but confident this will be resolved. Up-to 350 units can be achieved prior to provision of the relief road. Reasonable to assume 300-350 units achievable within 5 years as agreed by Inspectors at recent appeals. 2 private developers and an affordable housing provider will be on-site. Given this, and the size of the site, reasonable to assume approximately 30 homes per quarter is achievable.	Medium
Gaydon Lighthorne Heath (GLH)	Proposed Allocation	2,500 (3,000 in total) + shops, community facilities & open space. Associated development of 100ha for JLR	2016/17 - 2020/21 = 700 2021/22 - 2025/26 = 1,000 2026/27 – 2030/31 = 800	n/a	0	CEGB / IM Properties	Developer confident of 25 units in Q1 of 2017 to 200 in year 3 and continues at this level throughout the plan period. Potential capacity to deliver some 2,700 units gives flexibility over supply. No significant infrastructure impediments to the delivery of this scheme as the M40 junction works and road re-alignment are funded separately and are being implemented independently of the scheme itself. Supplementary Planning Document being prepared on behalf of the Council and due for adoption. Environmental scoping application submitted. Planning application ready for submission following Core Strategy examination.	Medium-High

- 4.8 Overall, the Canal Quarter is considered to be comparatively higher risk as it involves numerous landownerships and the relocation of existing businesses to proposed new employment sites. However, there is strong desire and commitment at the local level to realise the potential of this site. This proposal is also being promoted in the emerging Stratford-upon-Avon Neighbourhood Plan, and is supported by a number of local organisations including Stratford-upon-Avon Town Council, Stratford Voice, Stratford Vision, the Alveston and Shottery Village Associations, Stratford College and Stratford-upon-Avon Town Trust. This demonstrates a shared vision at the local level, in accordance with Paragraphs 69 and 183 of the NPPF. A driver of the allocation is the District Employment Land Study which identified scope for certain industrial and commercial areas that have become outworn, such as the Western Road area and land off Masons Road, to be considered for mixed-use purposes, including residential. It is desirable to plan the site comprehensively and to establish a manageable basis on which to progress individual planning applications. As such, the Canal Quarter proposal will be supported by a Supplementary Planning Document (SPD) to ensure comprehensive solutions are proposed and adhered to, and that development in one location does not prejudice development elsewhere. It is evident from initial enquiries that some parts of the site are relatively unconstrained by virtue of either land ownership or current occupation.
- 4.9 The Site Allocations Plan will identify further sites, including contingent sites, although in accordance with the approach set out in the Core Strategy, they are not proposed to be of a strategic scale.
- 4.10 The housing trajectory also includes an allowance for 'windfalls'. These are sites that have not previously been identified and become available unexpectedly. Given the rural nature of the District, with numerous settlements each comprising older built-up areas (that generally have more opportunities for infilling), the Council considers it appropriate to include a modest allowance for windfalls from small sites of 1-4 homes in the Core Strategy. This approach is not inconsistent with the NPPF which requires plans to meet housing needs in full. The housing trajectory demonstrates how the Council is fulfilling this requirement.
- 4.11 The inclusion of a windfall component in the Core Strategy provides greater flexibility to the delivery of housing, and gives clarity to both applicants and communities that such schemes are supported in principle.
- 4.12 The housing trajectory (Figure 2b) assumes an annual average of 27 windfalls in Phases 2, 3 and 4 of the plan period being delivered in Stratford-upon-Avon, the 8 Main Rural Centres and across the rural area. This number is based on analysis of past levels of supply from windfalls excluding those from residential garden land, replacement dwellings, and in Local Service Villages. It is important to note that past levels of windfall supply, which exceeded this rate, did so in a more restrictive policy context. The Core Strategy not only sets a more dispersed strategy to development, but its approach is also more flexible.
- 4.13 Whilst considering past supply trends is helpful, it is still important to establish whether future rates of windfall can be maintained and whether, moving forward, there is confidence that the windfall allowance is reasonable. The Council has undertaken some sample urban capacity modelling to establish whether there are likely to be sufficient sites available to justify the windfall allowance. Taking account of the likelihood of sites coming forward for development, the potential number of homes from small sites (1-4 homes excluding residential garden land) was identified. In the sample Main Rural Centre, potential capacity of 66 homes was identified. In the two sample Local Service Villages (category 2 and 4) potential capacity of 19 and 6 homes was identified, respectively. Extrapolating this potential across the number of settlements in the settlement hierarchy results in a total of 826 homes, or 55 per annum, over the 15 years across Phases 2, 3 and 4 of the Plan Period.
- 4.14 The Core Strategy windfall allowance assumes sites would come forward on both brownfield and greenfield sites. Although the Council is not basing its windfall allowance in the Core Strategy on supply from the Local Service Villages, the figures as a whole (which are over double the assumed

windfall rate) are considered to be a reasonable and robust proxy for the potential windfall capacity from Stratford-upon-Avon, the Main Rural Centres and the rural area.

- 4.15 It should also be noted that the Council is currently reviewing its Strategic Housing Land Availability Assessment (SHLAA). In line with national guidance, a minimum site size threshold of 5 units has been applied. Thus, there will not be any double-counting between sites coming forward as small windfalls and sites identified in the SHLAA.

5. 5 Year Housing Land Supply

- 5.1 The 5 year housing land supply calculation (5YHLSC) is a comparison between the anticipated supply of new homes and the housing requirement. It is expressed as the number of years' worth of supply. So as to avoid being skewed by annual fluctuations in housing supply, it is calculated over a 5 year period. It should therefore exceed 5.
- 5.2 In accordance with the NPPF, a percentage 'buffer' is applied to the 5 year requirement moved forward from the remainder of the plan period to ensure choice in the market. The purpose of this buffer is to provide an element of 'headroom' to ensure that the required number of homes is actually achieved: the logic being that the Council is more likely to achieve its target if the market has a larger 'pot' of homes from which to choose.
- 5.3 In recent appeal decisions in Stratford-on-Avon, Inspectors have concluded that a 20% buffer should currently be applied to the 5 year housing supply calculation because housing delivery has been at a low rate in previous years. This will of course be reviewed as the housing trajectory is implemented and supply exceeds the annual average requirement. More importantly, however, Stratford-on-Avon District Council is taking action to remedy the shortfall by granting permissions for sustainable development in order to deal with the shortfall in the in the first 5 years. This is evident in the stepped increase in supply since 2011. The Core Strategy Housing Trajectory is predicated on meeting the shortfall in the short-term.
- 5.4 As can be seen in Figure 5, the Council can demonstrate over 5 years' worth of housing land supply irrespective of whether a 5% or 20% buffer is applied, based on the housing required of 11,300. It should be noted that this 5YHLSC calculation includes the Core Strategy strategic allocations as set out in the housing trajectory, including supply at Gaydon Lighthorne Heath and the Canal Quarter Regeneration Zone.

Figure 5: 5 Year Calculation

5 Year Period: 2014/15-2018/19	Requirement to start of 5 year period	Completions (in previous years)	Surplus / Shortfall	Commitments within 5 year period	5 Year Requirement (inc 5% Buffer)	5 Year Requirement (inc 20% Buffer)	5 Year Annualised Average	Land Supply (Years)
11,300	1,695	739	956	4,724	3,970	n/a	794	6.0
	1,695	739	956	4,724	n/a	4,537	907	5.2

Notes:

The base date of this calculation is 31 March 2014. Completion and sites granted planning consent between 1 April and 30 September are also included as commitments. Although the latter post-date 31 March in terms of gaining planning consent, they form the equivalent of identified sites as part of the housing trajectory. For this reason, it is appropriate to include them in the Core Strategy 5 years supply calculation.

- Completions in Previous Years

The number of homes built from the start of the plan period to the current year:

- 2011/12: 133
- 2012/13: 285
- 2013/14: 321

- Commitments

The number of homes expected to be built within the five year period (avoiding double counting) from the following sources (figure may not sum due to rounding):

- Under construction: 1,815
- A 10% deduction for non-implementation is applied to the following commitments:
 - Full planning permission but not started: 837
 - Outline planning permission: 596
 - Resolution to Grant: 528
 - Core Strategy Strategic Allocations: 860
 - Core Strategy Non-Strategic Allocations: 87
 - Core Strategy Local Service Village Allocations: 0

- 5.5 The 5 years supply calculation includes an allowance for supply from windfall sites in the last 3 years of the 5 year period at a rate of 27 per annum (in line with the Core Strategy housing trajectory). However, this allowance is embedded with the commitments figure which already includes supply from in-excess of 81 homes from small windfall sites so it does not need to be specifically listed.
- 5.6 The Council’s view is that, in reality, windfalls will continue at a high-level and that it is highly likely that further supply from small site windfalls will occur within the next 5 years as unidentified sites continue to obtain planning permission and are built. Given this, and coupled with the fact the 5 year supply calculation excludes any reliance on Strategic Housing Land Availability Assessment (SHLAA) sites or contingent sites (as appropriate), the 5 year supply calculation is considered to be an extremely cautious presentation of land supply in Stratford-on-Avon District.
- 5.7 The Council has undertaken 5 year supply modelling to test whether a 5 year supply can be maintained throughout the plan period. The results of this modelling are shown in Figure 6.

Figure 6: Indicative 5 Year Supply Modelling Results

Phase	5 Year Period		5% Buffer	20% Buffer
1	2015/16	2019/20	6.33	5.54
2	2016/17	2020/21	6.39	5.59
	2017/18	2021/22	6.95	6.08
	2018/19	2022/23	7.67	6.71
	2019/20	2023/24	8.44	7.39
	2020/21	2024/25	8.58	7.50
3	2021/22	2025/26	7.92	6.93
	2022/23	2026/27	7.24	6.34
	2023/24	2027/28	6.46	5.65
	2024/25	2028/29	5.81	5.09
	2025/26	2029/30	5.17	4.52
4	2026/27	2030/31	4.56	3.99
	2027/28	2031/32	3.31	2.90
	2028/29	2032/33	2.25	1.97
	2029/30	2033/34	1.34	1.17
	2030/31	2034/35	0.59	0.52

- 5.8 It must be stressed that these calculations are purely indicative as they are predicated on completions occurring as expected and do not take account of development timescales in respect of when site construction commences. As can be seen from Figure 5, a deduction for non-implementation is applied to commitments that are not under construction. Because development timescales are unknown, for modelling purposes, a generic 6.5% deduction has been applied to all commitments including homes under construction. This percentage is based on the difference in the actual commitments figures for 2014/15 before and after deductions.
- 5.9 The modelling shows that a 5 year supply can be maintained to 2026/27. The fact that at the current time 5 years supply cannot be demonstrated throughout the plan period is not unexpected or surprising, for two reasons. Firstly, the trajectory currently excludes contingent sites which will be identified through the Site Allocations Plan. As set out in the Core Strategy, these would be brought forward if required in Phase 4 of the plan period. These would then be added to the housing trajectory. Secondly, because housing supply is continuous, the end of the current plan period will be the start of the next, bringing with it its own housing target and set of further identified sites. The Council has committed itself to a regular review of the Core Strategy, including an early review to address cross-boundary issues should this prove to be necessary.
- 5.10 Notwithstanding this, the Council is seeking to provide some certainty beyond 2031 through its identification of the strategic allocations at the Canal Quarter Regeneration Zone and Gaydon Lighthorne Heath, where a further 361 and 500 homes are expected post 2031, respectively. Although this contingency of 861 homes is embedded in the Core Strategy, it is not included in the current housing trajectory or taken account of in the modelling shown in Figure 6.

6. Affordable Housing Delivery

- 6.1 Stratford-on-Avon District Council has a good record of securing affordable housing. Policy COM.13 of the adopted Local Plan Review 2006 and the accompanying Meeting Housing Needs Supplementary Planning Document (SPD) seek provision of 35% (of floorspace) from sites of 15 or more dwellings/0.5 ha in the larger settlements and 10 or more dwellings/0.4ha in the smaller settlements.
- 6.2 It should be noted that whilst past levels of supply are an indicator of future performance, they need to be seen in the policy context that existed at the time (e.g. policy thresholds and distributional strategies) which may be different from the policy approach now being proposed. Figure 7 shows affordable housing completions since 2006/07. As can be seen, overall on average the provision of affordable housing accounts for 34% of the total housing completions. This figure represents the overall percentage achieved, not the average from eligible sites, which would be higher.

Figure 7: Affordable Housing Completions

Year	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	Total
Total Housing	454	401	172	244	102	133	285	321	2,112
Total Affordable Housing Completions	54	139	51	75	76	105	96	122	718
Affordable Housing New Builds	45	136	44	63	74	101	91	120	674
% of Affordable Housing	11.9%	34.7%	29.7%	30.7%	74.5%	78.9%	33.7%	38.0%	34.0%

- 6.3 Stratford-on-Avon District Council is a stock transfer authority having sold its entire Council housing stock in 1996. Thus, delivery of affordable housing over the plan period will primarily be through the Council's partner housing associations. Development opportunities will mainly arise through the acquisition of affordable housing on market-led schemes (i.e. s106 sites) although such provision assumes 'nil-grant'. Provision will also come from rural schemes, such as 100% Rural Exceptions Affordable Housing and Local Needs Schemes, and through existing dwelling purchases, although the latter is unlikely to provide a significant amount of supply. The Rural Housing Enabler has played an important role in helping to bring forward community-led rural schemes in the past and this role is likely to be just as critical in the future.
- 6.4 The Coventry and Warwickshire Strategic Housing Market Assessment (SHMA) prepared in 2013 identifies a level of affordable housing need in the District at approximately 233 homes per annum (see Table 66 and paragraph 8.72 in the SHMA). Taking this into account along with evidence of development viability, data from the Council's housing register (Home Choice Plus), findings of local needs surveys and contextual research undertaken for the Housing Strategy, Policy CS.17 of the Submission Core Strategy seeks 35% affordable housing provision from eligible sites of 6 or more homes. This approach is in line with the national affordable homes thresholds. Provision is also made for a 'commuted sum' where provision is not made on-site. Also of importance is the strategy of distribution set out in Policies CS.15 and CS.16 which set a dispersed approach to development across the District and the rural area.
- 6.5 It is also important to stress that meeting housing needs is about more than simply delivering on numbers of homes. It is also about providing the appropriate tenure, type and size of homes to ensure genuine affordability as well as the effectiveness of allocations and management arrangements.
- 6.6 There are essentially three main types of affordable housing: general needs accommodation, supported housing and housing for older people. The latter two in particular, will have more demanding locational criteria if they are to be successful. Developing supported housing requires access to revenue as well as capital funding being mainly provided by Warwickshire County Council but is, at the present time, increasingly insecure. In respect of general needs accommodation, this should be on-site by developers in partnership with registered providers / housing associations. Affordable housing will also be provided directly by housing associations on sites in their control, including rural exception sites or Local Needs Schemes, specific provision for which is made in the Core Strategy.
- 6.7 Delivery of affordable housing will reflect the overall housing trajectory set out in Figure 2. However, it is not possible to be as specific about the timing of affordable housing delivery for two reasons. Firstly, affordable housing typically comes forward as 'blocks' of provision and is dependent upon the phasing of individual schemes. Assumptions about average annual build-out rates that apply to market housing do not typically apply to affordable housing. Furthermore, detailed scheme phasing is not yet known on many sites. Secondly, a number of sites are still to be allocated through the Site Allocations Plan, particularly in the villages. The size of these sites will determine whether affordable housing should be provided at all, on-site or off-site through a commuted sum.
- 6.8 In respect of allocations in the Main Rural Centres identified through the Site Allocations Plan, since these sites will be larger and above the affordable housing threshold, it can reasonably be expected that they will provide the full on-site provision of 35% affordable housing equivalent to some 188 homes. Delivery is expected between 2017/18 to 2026/27.
- 6.9 In terms of Core Strategy strategic allocations ALC.1, ALC.2, SOU.1 and SOU.2 , it is reasonable to assume delivery of some 263 affordable homes in Phase 2 of the Core Strategy (2016/17 – 2020/21).

- 6.10 Because of issues of development viability and reflecting the type of units to be delivered, Policy SUA.1 seeks up to 25% affordable housing provision (up to 163 units) from the Canal Quarter Regeneration Zone in the plan period. Delivery of Phases 1a, 1b and 2 is expected between 2019/20 and 2029/30 although the quantum and timing of actual affordable housing provision on this site will be heavily dependent upon the detailed phasing. It is understood that Warwick House will not provide affordable housing onsite.
- 6.11 Although 35% affordable housing provision is sought from Gaydon Lighthorne Heath (Policy GLH), not all of this will be provided on-site. Rather, a percentage of affordable housing provision will be made off-site to assist neighbouring local communities. This approach reflects the fact that, in existing settlements, whilst 35% is sought on individual sites, affordable housing does not make up 35% of the settlement as a whole. Since Gaydon Lighthorne Heath will be a settlement in itself, it would not be appropriate for over a third of homes to be affordable. Delivery at Gaydon Lighthorne Heath is expected in Phases 2, 3 and 4 of the Plan Period. Whilst the actual percentage to be provided onsite and detailed phasing is still to be determined, Gaydon Lighthorne Heath will deliver the equivalent of 875 affordable homes within the plan period.
- 6.12 In respect of windfalls, it is assumed that this allowance will be met on sites of between 1-4 homes and general market schemes of this size would not ordinarily deliver affordable housing. Windfalls could however, be delivered as Local Needs or Rural Exceptions schemes which would provide affordable housing, but these cannot be predicted.

7. Potential Risks to Delivery

- 7.1 This section examines the potential risks to the delivery of new dwellings in Stratford-on-Avon district and considers possible reasonable mitigation measures.

Economic Viability

- 7.2 The general health of the wider economy is a major factor in the supply of housing, particularly the performance of the construction industry. The housing market is relatively buoyant in Stratford-on-Avon District and market demand is strong as reflected in the high house prices. This economic context is extremely unlikely to change but local economic performance is obviously relative to the performance of the wider economy. Confidence in the economy and the housing market is recovering and this can be seen in the increasing rates of annual completions in the last couple of years. Adoption of the Core Strategy followed by the Site Allocations Plan will provide more certainty to the market. However, if the housing market experiences another downturn then this will have a detrimental impact on completion rates and is something that Stratford-on-Avon District Council would have little influence over.
- 7.3 It would be misleading to cite an average annual rate of completions over recent years as an indicator of what the market can deliver because of both the recession and the imposition and effects of the housing moratorium. It is perhaps more useful to consider completions in the 5 years prior to the moratorium (2001-2006) which averaged 593 per annum, peaking at 806 in 2004/05. This suggests that with favourable economic conditions the average annual target of 565 in this plan period is achievable. However, the Council is acutely conscious that the housing trajectory is predicated on achieving significant rates of completions in the short term, peaking at 1,343 homes in 2016/17; increasing the 806 achieved in 2004/05 by some two-thirds. This step change in delivery reflects the Government's ambition to boost significantly the supply of housing but requires significant and genuine commitment from the housebuilding industry.
- 7.4 The 1,343 figure is of course indicative. In reality, some of these homes could be delivered in the subsequent couple of years without impacting significantly upon the overall housing trajectory or the 5 year supply of housing. However supply is achieved, it is not considered unrealistic given the

nature of Stratford-on-Avon (i.e. large rural District, with numerous settlements subject to a range of housing market influences) and the fact that supply will be achieved on a high number of sites rather than dependent on a select few.

- 7.5 In terms of the development viability of individual schemes, the Core Strategy enables consideration to be given to such matters through the Development Management process. In addition, the Council has undertaken viability technical work to inform the Core Strategy and the Community Infrastructure Levy (CIL) which shows that the cumulative policy impact does not jeopardise the viability of schemes in the District.

Infrastructure

- 7.6 The infrastructure deemed necessary to support the Core Strategy is set out in the Infrastructure Delivery Plan. The Council is seeking to implement its Community Infrastructure Levy (CIL) to ensure that development contributes towards the provision of infrastructure. Remaining infrastructure will be provided by the service providers as part of their service delivery plans. Overall it is considered that the necessary infrastructure will be available to support development. Whilst the District Council is not responsible for infrastructure provision as such, as the Local Planning Authority it will work with site developers, Warwickshire County Council and service providers to ensure that infrastructure is delivered to support development.

Commitments

- 7.7 There is always a risk that identified sites – whether allocated or with planning permission – will not actually get built. This is perhaps less likely in a District such as Stratford-on-Avon and certainly many of those permissions that do lapse tend to be superseded by alternative schemes. The risk of non-delivery of large sites is considered low. As set out in Section 5, a 10% lapse rate is applied to all commitments (excluding those under construction). However, this flat rate does not take into account any distinction in the likelihood of delivery between sites with full planning permission and sites with other identified sites (e.g. outline permission, allocations etc). The Council considers a 5% lapse rate may be more realistic for sites with full planning permission. This position has been supported at appeal. However, by applying the 10% rate across the board, the Council has built in flexibility to the trajectory and land supply calculation.
- 7.8 It is acknowledged that some previous Local Plan allocations never came to fruition. However, the Council is confident that its approach of only allocating sites deemed to be deliverable will ensure that the allocations identified in the Core Strategy and Site Allocations Plan will come forward for development. The Council's assumptions regarding phasing and average annual build-out rates on the allocated sites are also considered realistic, being based on past trends and delivery of similar sites from elsewhere. Notwithstanding this, the Council is committed to identifying contingent sites to provide flexibility and maintain delivery of the housing trajectory.
- 7.9 The housing trajectory does include an element of windfall: some 405 homes over a 15 year period or an average of 27 per annum. This allowance is based solely on expected delivery from small sites (i.e. 1-4 homes) coming forward in Stratford-upon-Avon, the 8 Main Rural Centres and the rural area. This level of windfall is considered reasonable given past high-levels of supply and the rural nature of the District comprising numerous settlements with older built-up areas.

Neighbourhood Plans

- 7.10 25 Neighbourhood Plans are currently in preparation and making good progress across the District, including Stratford-upon-Avon town, 7 of the 8 Main Rural Centres and nearly half of the Local Service Villages. The Council supports this bottom-up approach to planning and has a dedicated Neighbourhood Planning Officer to support parishes to bring forward Neighbourhood Plans. Notwithstanding this, the Council understands there is a risk that any particular Neighbourhood Plan may not be 'made' and therefore not contribute allocated sites to the housing supply. In order to

mitigate this risk, contingent sites will be identified in the Site Allocations Plan to ensure that delivery of the housing trajectory is maintained.

8. Monitoring and Review

- 8.1 As set out in this Housing Implementation Strategy, the Council considers that mechanisms are in place to ensure that a 5 year supply of housing can be maintained and that the housing trajectory is deliverable to meet the housing needs of the District, without compromising its sustainable development objectives.
- 8.2 Progress on the delivery of housing will be checked through the Authority's Monitoring Report (AMR) and annual updates of the housing trajectory and 5 year supply calculation. The Strategic Housing Land Availability Assessment (SHLAA) will also be reviewed on a regular basis to ensure information on the deliverability of sites is kept up-to-date. Where the Council considers that a 5 year supply cannot be demonstrated, it will release contingent sites for development.