



## **Wyre Forest District**

### **Site Allocations and Policies Plan**

#### **Examination**

#### **Matter 2: A Desirable Place to Live**

#### **WFDC Response**

14<sup>th</sup> January 2013

## Matter 2 – A Desirable Place to Live

1. **It is suggested that the overall housing target as specified in the adopted Core Strategy is out-of-date. Does the Plan make provision for sufficient housing based on up-to-date assessments / evidence of need? Are the policies sufficiently flexible to accommodate any additional residential development that may be required?**
  - 1.1 The Council does not agree that the overall housing target specified in the Adopted Core Strategy (SD003) is out of date. The Adopted Core Strategy policies DS01 and DS05 aim to deliver 4,000 net additional homes over the plan period (2006-26). This figure evolved having regards to the formerly emerging West Midlands Regional Spatial Strategy (WMRSS) which set a requirement for the District of 4,000 dwellings (200 per annum) for 2006-26. This is the **minimum** level of new dwellings which the plan seeks to deliver for the district during the plan period. The Council promoted such growth through the Examination in Public on the basis that it fitted well with the strategic aim of focussing a higher level of growth in the West Midlands conurbation including Birmingham and the Black Country as well as suiting local circumstances. The Planning Inspector concluded that the Black Country and Birmingham will continue to deliver new housing and jobs at the above-trend levels anticipated in the formerly emerging WMRSS.
  - 1.2 At the time of the Examination into the Core Strategy (summer 2010), the 2006-based household projections were available and these showed a projected increase of 8,000 households over the plan period. The Inspector (SD004) concluded that it would be premature to conclude that the Core Strategy had seriously under-estimated the number of dwellings required. However, he thought it would be wise for the Council to closely monitor actual household formation alongside new dwelling delivery so that, if an apparent and serious mismatch between the two did occur, the strategy could be subjected to a review. The 2008-based household projections published in November 2010 show a projected increase of 6,000 households over the plan period from 42,000 in 2006. Recently published results from the 2011 Census show the number of households to be 43,000, an increase of 2,700 since 2001. During that time the dwelling stock increased by nearly 2,900.

- 1.3 The latest Strategic Housing Market Assessment (GVA 2012) (EB018) suggests a requirement for between 3,240 and 7,050 additional dwellings in the district between 2011/12 and 2029/30 to meet the demands generated by new household formation. This equates to a need for between 170 and 370 new dwellings a year. The latest housing trajectory (EB025) shows a predicted annual housing supply of over 350 dwellings for the next 4 years which is at the top end of the suggested dwelling requirement. After this time, it is expected that that Core Strategy will be reviewed.
- 1.4 The Strategic Housing Land Availability has shown that there is sufficient previously developed land which can be brought forward for development to provide around 4,400 dwellings in total. Under paragraph 47 of the NPPF, local planning authorities should “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%...” Evidence of this 5% buffer is provided at paragraph 5.3 of the Housing Technical Paper (EB025). Recent planning consents have shown that many of the key sites are already coming forward for development despite the downturn in the economy. The Council considers that the policies contained in the Site Allocations and Policies DPD are sufficiently flexible to accommodate additional residential development. The DPD is proposing to allocate sufficient sites to meet the housing requirement set out in the Core Strategy but policies would not preclude other sites coming forward if they were required to meet housing need. Many of the proposed sites would not only provide housing but would be key to the successful regeneration of Kidderminster and Stourport-on-Severn. In addition to the proposed allocations, small windfalls are likely to continue to come forward on previously developed sites in accordance with proposed policy SAL.DPL1. It is also proposed to introduce an amendment to Policy SAL.DPL1 (SALMOD02) which would allow small windfall sites of 5 or less dwellings to come forward in Bewdley on previously developed sites in areas allocated primarily for residential development on the Proposals Map.
- 1.5 Furthermore, the continuing justification for the use of the WMRSS figures have more recently been tested at examination in a neighbouring authority, South Staffordshire. The Inspectors report for the South Staffordshire Core Strategy (17<sup>th</sup> October 2012) determined that the proposed housing target, as identified in the WMRSS, was an

appropriate figure to guide development in South Staffordshire over the plan period. This approach was considered to be consistent with the NPPF and further justifies the continued approach taken by the Wyre Forest regarding the retention of the 4,000 dwelling requirement adopted in the Core Strategy.

**2. How has the SAPDPD evolved in terms of the alternatives considered? How were these evaluated and have all reasonable options been examined? Are the choices made properly justified and is it clear from the Sustainability Appraisal why the preferred options have been chosen? Have the choices and phasing of development been sufficiently informed by the Infrastructure Delivery Plan and Sequential Testing (Flooding) reports?**

2.1 The Plan considered all of the alternatives assessed as part of the Strategic Housing Land Availability Assessment (EB010). Sites suggested during the consultation stages were assessed as part of the SHLAA updates (EB011 and EB012) and as part of the Sustainability Appraisal (SA) process. Each of the sites was tested against the SA framework, the information was summarised and a sustainability ranking of 1-4 was awarded to each site. The preferred options were mainly those sites which were awarded a 1 or 2 through the SA process however, where this is not the case the reasons for allocating the sites are set out within the SA Report (chapters 6 and 7, Final SA Report (SD032)). The SA framework sets out 21 criteria. Information from the evidence base was used to assess the effect that the allocation of each site would have on the baseline position; whether this would be positive or negative; the severity of the effect; the length of time for which it would last and whether or not the effect would be reversible. The SA framework includes a criteria relating to flooding and evidence from the Strategic Flood Risk Assessment (EB041) and the Water Cycle Strategy (EB043) was used to inform the appraisal of the sites against the sustainability objectives.

2.2 A small number of sites were included within the SHLAA and then discounted from the SA process because they were no longer suitable for allocation as they either had had planning permission granted or were no longer deliverable because they were in an alternative use. These sites, and the reasons for which they were discounted from the SA process, are set out at paragraph 6.1.4 of the Final SA Report (SD032)).

- 2.3 The selection of sites within the document has been specifically informed by the evidence base, including work on infrastructure and flood risk. The flood risk sequential test has used the information provided by the Level 2 Strategic Flood Risk Assessment (EB042) to help direct development to flood zone 1, where possible. The sequential test identifies that approximately 95% of the Council's proposed land allocation will fall within flood zone 1. There has therefore been a clear approach to ensuring, where possible, that a sequential approach to site selection has been followed. This is considered to be consistent with the NPPF. It is not considered possible to completely avoid flood risk due to the competing priorities in terms of allocating sites, i.e. some other sites considered in the sequential test were in flood zone 1 but were Green Belt and therefore were contrary to the adopted Core Strategy and the aims of the NPPF. Therefore, it is considered a balanced approach to the allocations of sites has been followed, which takes account of the flood risk sequential test as well as following the aims and objectives of the other policies in the NPPF and the Adopted Core Strategy. Furthermore, in some of the more constrained flood risk areas, the phasing has been set for later in the plan period to reflect the fact that there are more constraints associated with bringing forward the site.
- 2.4 The plan has also been developed taking into account the various infrastructure requirements and constraints that exist within the District. The Infrastructure Delivery Plan (IDP) (EB062) provides the background information in relation to the requirements within the District. The IDP identifies where there are gaps in provision and the Site Allocations and Policies Plan has proposed sites and strategies to help bring some of these provisions forward. For example, the former British Sugar Site policy (SAL.SK2) has been specifically drafted to enable a mixed use proposal to be developed enabling the delivery of part of the Hoo Brook Link Road in the process. Other sites include the allocation of the former Parsons Chain Site (SAL.EA3) which is required to implement another section of the Stourport Relief Road as part of the development of the site. It is clear, therefore, that the document has been prepared with a thorough understanding of the infrastructure requirements and sets out a comprehensive strategy for delivery.
- 2.5 There continues to be a healthy residential and employment land supply within the District, meaning that development has been secured over the short term which has

taken into account infrastructure needs. This provides short to medium term certainty that the plan is deliverable taking into account infrastructure requirements and recognising the fact that some of the more challenging elements of provision (i.e. roads) are likely to be developed later in the plan period.

2.6 The document has also used the information on infrastructure requirements to set the potential phasing periods in the plan. For example, there are some constraints highlighted with regard to development at one of the smaller Kidderminster sites, Rifle Range Shops and Musketeer PH (SAL.KSS1) and Clows Top (Policy SAL.RS2) in relation to waste water. The phasing periods for these sites have therefore been set for later in the plan period to reflect that there may be more difficulties to be overcome than other sites allocated within the document.

2.7 Overall, it is considered that the document provides a balanced and deliverable approach to new development taking into account both flood risk and infrastructure requirements.

3. **It is suggested that the DPD is flawed and unsound as it fails to identify enough land to accommodate sufficient affordable housing. Does the Plan adequately address the provision of affordable housing?**

3.1 The latest Strategic Housing Market Assessment (GVA 2012) (EB018) shows an annual affordable housing need of 210 dwellings. This is an increase on the need for 175 dwellings at the time of the Core Strategy Examination. Given the allocation for 4,000 dwellings within the Core Strategy, (including market and affordable dwellings), to be delivered at an average of 200 a year, it would be impossible to deliver enough affordable units to cater for this need, due to site viability issues and the need to deliver a balanced housing market across the District. The majority of affordable housing will be delivered alongside market dwellings as per Policy CPO4 of the Core Strategy through Section 106 agreements. Policy CPO4 requires sites to provide 30% affordable dwellings unless this is proven to undermine the financial viability of the development. This target was subject to rigorous scrutiny at the Core Strategy examination in 2010, with the Inspector concluding in his report (SD004) as follows (Paragraph 36):

*“In 2009 a viability assessment of 23 potential housing sites and an updated addendum in March 2010 indicated that while an initial target level of 40% would lead to some instances of negative development value the level of 30% in Policy CP04 would in most cases produce schemes which were viable. Such assessments are known to be highly sensitive to cost and value variations and hence it is recognised that individual assessments are needed on a project-by-project basis. The policy wording allows for such site-by-site assessments and hence it is flexible and in line with national guidance.”*

- 3.2 Any unallocated windfall sites that came forward for 6 or more dwellings would be required to provide 30% affordable housing within Bewdley and the rural areas and 30% for sites of 10 or more dwellings in Kidderminster and Stourport on Severn. In addition to affordable housing provided on allocated sites, other locations listed in policy SAL.DPL1 or windfall sites where the affordable threshold set out at CP04 would be reached, rural exception sites may also be brought forward. These schemes will be for 100% affordable housing unless a financial viability assessment shows that an element of enabling market housing is required to make the development viable. Any affordable housing provided on rural exception sites will be in addition to the 4,000 dwelling allocation set out in the Adopted Core Strategy. Such schemes can be brought forward where an affordable housing need has been established via a Parish Housing Needs Survey or, if unavailable, housing waiting list data. Policy SAL.DPL2 (Rural Housing) sets out a more detailed policy for rural exceptions sites and includes an element of flexibility to allow for enabling market housing to improve the deliverability of such sites.
- 3.3 Adopted Core Strategy Policy CP04 aims to deliver around 60 affordable units a year. There were 73 affordable units completed in 2011/12, 89 are expected to complete in 2012/13 and 108 in 2013/14. The District Council therefore considers that it is demonstrating the satisfactory delivery of affordable housing in line with the targets as set out in the Development Plan. Indeed the SHMA 2012 (EB018) recognises that the reduction in the availability of grant monies for affordable housing places greater pressure on delivering affordable housing through traditional planning obligation approaches. It therefore suggests that a pro-active approach in encouraging the delivery of more viable housing sites to address the wider demand for all tenures of

housing. This will assist the ability of households to purchase housing through improving supply to help deflect increasing house prices.

4. **Policy SAL.DPL2 restricts development in Bewdley and rural areas (other than those allocated for development), except in specific circumstances, including schemes for 100% affordable housing. Is the provision of 100% affordable housing justified and a viable proposition on windfall sites?**

4.1 Further to representations received from Bewdley Town Council and the NPPF's emphasis on delivering competitive returns on development, the District Council considers it prudent to suggest a modification to Policy SAL.DPL2. The modification (SALMOD03) proposes the removal of Bewdley from the policy so that it applies to the District's rural areas as indicated by the policy title.

4.2 A further modification is also proposed for Policy SAL.DPL1 – Sites for Residential Development (SALMOD02). This would allow small windfall sites of 5 or less dwellings to come forward on previously developed land within Bewdley on areas allocated primarily for residential development.

4.3 It is considered that these proposed modifications would add an element of flexibility to the Plan at the more detailed site allocations stage. Furthermore, they are entirely consistent with guidance set out in the NPPF.

5. **Is Policy SAL.DPL2 consistent with the Core Strategy, in particular Policy CPO4?**

5.1 The Council considers that Policy SAL.DPL2 is consistent with the Adopted Core Strategy (SD003). Policy CP04 (Affordable Housing) advocates a proactive approach to the provision of affordable housing within the District's rural areas. It promotes partnership working with the Parish Councils to identify sites solely for affordable housing where a local need exists. Policy SAL.DPL2 sets out the specific requirements for rural exceptions sites and therefore essentially provides the more detailed layer for the overarching Core Policy.

5.2 The Adopted Local Plan included a policy for rural exceptions sites (H11), but it has been increasingly difficult to deliver housing under its terms, due to viability issues.



Only one rural exception site, for 10 dwellings at Fairfield, has been successfully implemented under this policy.

5.3 Since the adoption of the Core Strategy, new rural housing policy guidance in the NPPF has come into effect. This is much more flexible than previous policy. At paragraph 54 (SD001), it states that local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of additional affordable housing to meet local needs. Rural exception sites may also include a small element of market housing to make schemes economically viable in the absence of grant funding.

5.4 The District Council considers that Policy SAL.DPL2 presents a more flexible and deliverable policy to address affordable housing needs within the District's rural settlements.

**6. Is Policy SAL.DPL6 consistent with the National Planning Policy Framework, in particular paragraph 60?**

6.1 It is considered that policy SAL.DPL6 is in conformity with paragraph 60 of the NPPF, which requires planning authorities to not impose particular architectural styles on development. The provisions of Policy SAL.UP6 require any extension coming forward under this policy to:

- be physically linked into the existing dwelling;
- have a shared entrance and strong links at ground and first floor levels;
- have shared vehicle and pedestrian access; and
- only have one bedroom

6.2 However, there are no stipulations as to how these requirements should be met architecturally. These requirements are set out in order to prevent new residential development occurring where it would not normally be permitted under the terms of the Adopted Core Strategy. It is not felt that the requirements of this policy are contrary to paragraph 60 of the Framework.