

Wyre Forest District Council Local Development Plan Examination

Statement in relation to Inspector's Matter 6

1.0 This statement reflects three particular concerns: the overall projection of the number of new dwellings required across Wyre Forest over the duration covered by the plan; the proposed allocation of housing density as between two of the sites in Policy 34 and the nature of the build on one particular site.

2.0 Projected new dwellings for Wyre Forest 2016-36

Inspector's Matter 6.2(i) asks of the Plan *"Are the specific requirements for development of the sites justified, consistent with national planning policy, and likely to be effective? Do they make sound provisions for the number and types of dwellings.."*

2.1 This first, general concern relates to the overall number of new dwellings projected over the Plan period for Wyre Forest. The contention is that it is unnecessarily high and could thus be scaled back for each of the sites included in the Plan.

2.2 The Housing Needs Study 2018 (HNS), item HOU01 in the Examination Library, states at para 8.4 that *".. the Government's standard methodology establishes a minimum need for 276 dwellings each year over the period 2018-2028.."* Extrapolating this annual figure over the Plan's projected 20 year cycle arrives at an overall total of 5520. The various methodologies deployed in arriving at this figure are, to the lay observer, bewilderingly complex. At the risk of over-simplicity it is worth reminding ourselves that the population of Wyre Forest has, according to the Office for National Statistics remained remarkably static over a surprisingly long period. The 20 year period from 1999 to 2019 contained in ONS data shows an increase of just 4,300 or 4.4%. This represents a much smaller increase than the 14% increase for the UK as a whole over the same period. We also know that the area has an aging population, a point that will be returned to below in relation to the nature of the new build proposed. Table 6.0.2 of the Plan, in summarising the proposed new dwellings for each of the WFDC areas, arrives at an overall total of 6341, thereby allowing for the recommended 15% uplift contingency which, incidentally, seems somewhat high given the 2.76% vacant dwelling rate shown in Table 4.1 of the HNS.

2.3 It is therefore submitted that the overall targets could be scaled back for each of the new housing development sites listed in the Plan to reflect the historical population trend. The area's ageing profile would also suggest that this trend may, in the absence of a major change to net inward migration, not seen in any evidence underlying this Plan, actually be on a reducing profile over its duration.

3.0 Policy 34 Allocations

Inspector's Matter 6.3 asks of the Plan *"Is each of the allocated sites viable and likely to be delivered within the expected timescale? Does the evidence, including any up-to-date information, support the housing trajectory for the individual sites?"*

3.1 Table 34.0.1 in the Plan shows the proposed allocations for sites designated for new housing development in Bewdley. Aside from the general point above regarding individual scale-backs, policy 34 does not provide a justification for an apparent discrepancy between sites WA/BE/1 and WA/BE/3.

3.2 In particular, 100 units are proposed for the former on 3.6 ha and 75 for the latter on 5.61 ha. On the basis of land available per plot alone, this seems illogical. Furthermore, as argued previously under Inspector's Matter 3, there is already a serious strain on the B4195, Stourport Road.

3.3 Para 34.7 of the Plan makes no reference to vehicular access to this site other than describing it as being *"onto Stourport Road.."* Without the traffic calming measures referred to in relation to Matter 3, especially the construction of a new roundabout on the junction of the B4195 and the A456, which could afford direct access to any development on WA/BE/1, the congestion and problems for both local schools and residents can only get worse. This would arise from both the travel-to-work journeys associated with new residents, many of whom would still need to commute, and their access to local services in Bewdley Town.

3.4 It would thus seem sensible, if accepting the Plan's justifications for removal of the current Green Belt designation for both of these sites, for the balance of housing density as between them to be reversed, thereby keeping the larger associated traffic growth firmly away from the 2 Bewdley schools. Access to WA/BE/3 could also be directly from the first A456 (ring road) roundabout which, it is believed, will be reconstructed anyway to afford new access for the 2016 approved development of the West Midlands Safari Park site.

4.0 The Nature of the Build

Referring back to the Inspector's question at 6.2(i) .. *"Do they make sound provisions for the.. types of dwellings.."* the Executive Summary to the HNS informs us that *".. over the period to 2036, the number of older person households is going to increase by around 4,900 and there will be a 31.4% increase in older people living in the district."* With this as a background it is therefore surprising that Policy 34 in the Plan makes no reference to the needs of this growing number of older people in any of the new sites proposed.

4.1 Perhaps as an afterthought, the only such reference appears to be in the March 2020 Table of Modifications, item SD12 in the Examination Library, which says of site BR/ BE/1 *"This site is allocated for residential development to cater for older persons"* . It is worth reminding ourselves here that this site offers up only 15 units towards an overall 225 projected total for Bewdley.

4.2 If there is an inescapable case for Green Belt designation removal from site WA/BE/1 It is submitted that it affords a strong opportunity to reflect the 75% stakeholder priority ranking given to “*properties designed for older people*” as depicted in table 8.0.2 of the Plan. This could include sheltered as well as general purpose housing which would:-

- a) Result in less impact on traffic and parking problems on B4195
- b) Provide a much easier type of building to facilitate the type of landscape screening around the site and against the by-pass (as envisaged in Policy 34.2 in the Plan) with communal garden space rather than individual fenced private gardens.
- c) Provide level access for walking into Bewdley, particularly important for older residents
- d) Provide a much needed type of housing facility locally that could then release other family properties in the town.

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