

Matter 8

Q8.1a Housing Mix

(i) Are the Plan's policies for a) housing mix and density, b) affordable housing, c) rural housing needs, d) self-build and custom-build housing, and e) housing for older people and others with special housing requirements sound? (ii) Do they allow reasonable flexibility to respond to site-specific circumstances? (iii) Should an affordable housing trajectory be included in the Plan to demonstrate how the target for provision is expected to be met over the Plan period?

At the core of our submissions is that WFDC is not required to provide any housing for Birmingham and the Black Country, because they constitute a separate housing market area. Experience in Hagley and elsewhere in Bromsgrove district is that developers perceive a high demand for 4- and 5-bedroom houses to meet the aspirations of wealthy professionals and business owners seeking to move out of the conurbation into a more rural location. We express no view on the number of smaller (1 and 2 bedroom) houses, but we consider the Plan should provide some limitation on larger houses, by imposing a maximum on those with more than three bedrooms.

Q8.1b&c Affordable Housing

Experience over recent years in Birmingham and Bromsgrove shows that an affordable target of 35% or even 40% is achievable, as long as a proportion of these are of a shared ownership tenure. We do not see why WFDC should not aspire to the highest possible affordable target in view of the number of applicants on the housing list.

The threshold of 10 houses before any affordable houses are required is too high. It is accepted that it is in accordance with government policy, but that policy is misguided. It would be appropriate if the target were 10% affordable, but with an affordable target of 25% (per Plan) or 35% (which we suggest below), the threshold provides a perverse incentive for developers to bring forward schemes for 9 houses (with none affordable) rather than 10 with 3 affordable. An appropriate threshold would be 4 (for 25%) or 3 (for 35%) so that such sites would deliver one affordable house.

This is particularly important for rural locations where allocations are likely to be small. In effect, the Plan is saying that affordable housing is not needed in rural areas, which at the same time contradicting itself by providing for rural exception housing. This is important because housing for the 25% (or 35%) is provided by developers as a matter of course, whereas total exception housing requires external funding.

For difficult sites that require extensive remediation (including decontamination) before development can take place, WFDC should be willing to negotiate a lower target.

Q8.1d&e Custom build, special needs, etc

On larger sites, we would suggest that the developer should be required to make a proportion of plots available for self-build, custom build by smaller builders, and for housing for those with special needs. This should be done by providing plots for sale, with all services laid (or contracted to be laid) to connect them to the mains.

Q8.2 *Is Policy 18B clear and consistent with Policies 6B and 6F with respect to the approach to residential infill development in villages and meeting local housing needs?*

We think these are consistent, but it would aid the clarity of the Plan if 6B did not merely list the types of development that are acceptable in villages, but cross-referred to the specific policies on each topic.

Q8.3 (i) *Are the Plan's policies for sites for Gypsies and Travellers and Travelling Showpeople informed by adequate evidence and consistent with national planning policy?* (ii) *What is the level of need that is likely to arise over the Plan period?* (iii) *Is there evidence to support any reliance on 'turnover' of pitches?* (iv) *How will the accommodation needs of Gypsy and Traveller households that a) meet the planning definition, or b) do not meet the planning definition or are 'unknown' be met?* (v) *Is provision for a transit site required in the District and if so, how should this be addressed by the Plan?*

We lack the expertise to deal with this topic, save to express a general proposition: we that Gypsies and other Travellers have a right to a home, as much as the settled community; neither more nor less. Precisely, the same development principles should apply equally to the settled and travelling communities. This is ultimately a human rights matter.

Q8.4 *How should any needs for non-conventional housing, particularly residential caravans/mobile homes and houseboats be addressed in the Plan?*

1. Parts of Wyre Forest district are infested with mobile home parks. The existing plan Policy CP12 contains a specific limitation on mobile home, caravan and chalet developments. This is carried forward and strengthened in the new Plan, in Policy 18D, which we consider fully warranted. It is also covered by Policy 28B.
2. The problem is that what were originally to be holiday homes start being occupied as the resident's main home. In effect, the person is having a "holiday" for 11 months per year, with a break often in January, when they remove themselves to warmer climes for a break, an actual winter holiday. This is an abuse arising from a past lacuna in the planning system. Some of the chalet developments date back to the 1940s before modern planning control, possibly even to wartime evacuations.
3. The mooring of houseboats along the river Severn is undesirable due to the risk of them being swept away when the river floods. Floods are also a risk to mobile home parks that have grown up on river meadows. It is also undesirable to have encourage the mooring of houseboats on the Staffordshire and Worcestershire Canal, much of which is within the Green Belt. Such mooring would be likely to be relatively remote from roads, with the result that residents would have poor access to local facilities.