

Land at Rock, Near Kidderminster
Owners: Messrs J & H Evans
Agent: Moule & Co. Hartlebury Kidderminster
WFDC Ref. **Response No.SALPP130**

Statement of Common Ground
Examination in Public commencing 29 January 2013
(Draft) MATTERS AND ISSUES FOR EXAMINATION DOCUMENT

Topics suggested for debate

It is noted that The Minister for Housing has confirmed in recent days that some green field land will need to be brought in to satisfy the national housing deficiency which includes affordable homes in the Wyre Forest District as a whole. It is hoped that between the date of lodging this submission and the EIP the Council will seriously review its position in this regard.

Relating to the SAPDPD the Inspector has raised at Matter 2 – A Desirable Place to Live :

Bullet point (2)

The Inspector has suggested that the SAPDPD may not have evolved in terms of the alternatives considered. We refer to the Inspector's Report of 18 October 2010 and paragraph 35 which confirms that the Inspector recognised the annual need then (2010) for 175 affordable homes. As will be seen on page 80 of Library Document SD037 the LPA stated:

“The latest SHIMA (GVA 2012) shows an annual affordable housing need of 210 dwellings. Given the overall quantum of housing development (200 p.a.) which was agreed by the Inspector at the Core Strategy examination, there is very limited scope to meet need on this scale”.

However we respectfully note that in his report of October 2010 Inspector Philip Goodman BA (Hons) DMS MRTPI continued and ended the said paragraph “and hence this becomes an exercise in the art of the possible”.

Importantly the Inspector did recognise in his report the short fall in housing development required to meet Affordable Housing needs. It is respectfully submitted that by utilising our representation in September 2012 the Council would have been able to explore the opportunity to improve this position.

The Inspector's Report in October 2010 appertained to the situation then, and with absolute respect to his recommendations at that time, matters have since changed again with the introduction of the NPPF and further evidence that the affordable homes deficiency has deteriorated considerably.

It is respectfully submitted that by reference to Bullet point (4) of the same Matter 2 (A Desirable Place to Live), had the representations made in September 2012 to bring forward more land within the District as a whole to assist in accommodating the affordable homes deficit been accepted, this would mean that the Council would not appear to be in conflict with its own Plan as well as the NPPF. Accordingly it is submitted that much of the Plan in regard the Policies of the provision of Housing is unsound, ineffective and so is not in accordance with the NPPF.

Library Document EB025 Housing Technical Paper produced in October 2012 after the representation was made in September 2012 confirms at 5.4 and 6.3 respectfully that the provision of mixed communities is required by paragraph 159 of the NPPF and that the affordable homes provision remains a very difficult issue to address. It is respectfully submitted that Core Strategy 04 is therefore flawed and the only remedy is shown in the representation made suggesting modification of that Policy and other relevant Policies.

It is respectfully submitted that these matters referred to above most importantly demonstrate that there is some common ground between the Representatives and the Council and in principle that it is accepted there is a dire shortage of land for affordable homes and that the in order to accommodate this over the whole District the landowners as Representatives have sought a mixed use in conformity with paragraph 159 of the NPPF.

The Inspector will however note with interest that the Council has in its response after September 2012 acceded that affordable homes could be built here. However the NPPF encourages a mixture of normal market homes in order to facilitate this provision.

Simply in conclusion the Council has willing landowners who have sought a change of Policies to accord to the NPPF. It is respectfully submitted that the Inspector ought to recommend this important change taking account the willingness of the landowners to accept a conditioned Policy as to the percentage of affordable and low cost housing on their land.

Moule & Co.
14 January 2013.