

STATEMENT ON POLICY SALRS.1 FROM CHURCHILL AND BLAKEDOWN PARISH COUNCIL

Policy SALRS.1 flows from the previous greenfield and ADR status of the Blakedown Nurseries site. Now this has been brought forward for residential development, the 100% affordable housing requirement no longer applies. The policy can therefore be removed, in the light of the Statement of Common Ground on the definition of local housing, or should be amended to reflect this definition.

Reasons Policy SALRS.1 is not adequate to address local housing needs in Blakedown

Policy SALRS.1 is only concerned with affordable housing, since this was the putative definition of local needs housing in the Site Allocations Plan (SALP). As such it was always inadequate and did not satisfy the aims of either the Core Strategy or the Site Allocations Plan itself (see Core Strategy Policy DS01 and SALP Paragraph 17.1, which speaks of the unique opportunities afforded by this site), so even if it is not agreed that it can be removed, it should at least be widened in line to address the SCG definition. There are wider local housing needs in Blakedown than just affordable, and the NPPF defines generally the duties of planning authorities to ensure these are met.

Wyre Forest DC (WFDC) has given planning permission on this site already, during which process the PC strongly disagreed with the proposed housing mix (see the attached minutes of our special meeting on 29/08/2012). WFDC appears to regard this as a *fait accompli* - the existence of this Planning Permission is the opening remark in WFDC's rebuttal of the Parish Council's (PC's) request for common ground by amending the policy for this site. As such, assuming the other agreed Statement of Common Ground (SCG) defining local housing is adopted, the PC would be satisfied that in the context of the NPPF, the combined additional detail provided by (1) the latest (2012) Parish Housing Needs Survey (HNS), (2) the proposed Neighbourhood Plan and (3) local housing waiting list data would be more than adequate to provide data for the housing mix to the extent that this detail is available, and would ensure compliance with Core Strategy policy DS01.

In addition to noting WFDC's NPPF duties, we comment on these three elements as follows:

(1) Parish Housing Needs Survey

Since our representation was made, it has been confirmed that WFDC officers are refusing to ratify the latest HNS. This is important to the PC because although planning permission has been granted, should amendments be required it is important that these reflect local need and the SCG. The previous parish HNS (2010), apart from being out of date, was only concerned with affordable housing and did not ask wider questions. The Parish Plan (also 2010) already reflected a need for certain specific types of market housing to accommodate downsizing and younger families (pages 8 and 21). The latest HNS contains a question designed to inform this identified need and we are unable to access the outcome at a crucial time. This information may

of course help the developer to tailor the market housing to the local need and at the same time optimise his sales opportunity on the site. The current planning permission includes 4, 5 and 6 bedroomed large family houses for which there is only a perceived need (see the Appeal decision on Castle Ash decision date 08/06/2011). These are purely speculative and we do not see how approving them was in line with paragraph 5.4 the Core Strategy, which promotes the deterrence of Out Migration to the Rural Areas of the adjoining districts from the Major Urban Areas (MUAs) of Birmingham and the Black Country Conurbation.

(2) Neighbourhood Plan

Churchill and Blakedown Parish Council has requested designation as a Neighbourhood, one of only two parishes to do so in Wyre Forest District. The other is Chaddesley Corbett. It may be no coincidence that both parishes lie north of Kidderminster, facing more development and out migration pressure from the MUAs than more southerly parts of Wyre Forest District. Neighbourhood Plans are a way that the local community working with the District Council can participate in the Planning Process directly in future, in a way not afforded by the Parish Plan. WFDC has not adopted any Parish Plans.

(3) Local Housing Waiting Lists

The PC is satisfied that WFDC's local lettings policy operates broadly on a "Parish connection first" basis, meaning applicants with local connections to a particular Parish will be considered for social housing first.

Conclusion

Policy SALRS.1 is therefore either redundant because local housing is agreed no longer to be confined to just affordable, which was not robust in the context of both the Core Strategy and the NPPF, or, in the absence of a Neighbourhood Plan which has yet to be developed out of the Parish Plan, it should be amended to refer to "local affordable *and other identified local* housing needs as set out within the latest Parish HNS and as indicated by local housing waiting lists" and the latest parish HNS should mean as it does in fact the 2012 HNS. Not to do so would distort the use of the site and breach the provisions of the adopted Core Strategy for Blakedown.

Attached:

Castle Ash Appeal Decision

Parish Plan

Minutes of the Special Meeting of the PC on 29/08/2012