

WYRE FOREST LOCAL PLAN EXAMINATION
MATTER 3 – OVERALL SPATIAL STRATEGY, GREEN BELT & HOUSING
LAND REQUIREMENTS

Inspector’s issues and questions in bold type.

This Hearing Statement is made for and on behalf of the HBF, which should be read in conjunction with our representations to the pre submission LPP2 consultation dated 17th December 2018. This representation answers specific questions as set out in the Inspector’s Matters, Issues & Questions document (ED16) published on 19th October 2020.

3.1 Overall, does the Plan set out a sound spatial strategy for meeting development needs, including any unmet need from neighbouring areas, and protecting and, where possible, enhancing the environment?

And in particular :

- a) is the broad apportionment of housing, economic and other development to the various centres, locations and rural areas throughout the District consistent with the Plan’s spatial vision and objectives, and does it promote sustainable patterns of development?**

As identified by the Inspector the overall spatial distribution and quantity of the proposed development in the District is not expressed in a single policy (Inspector’s Initial Questions & Comments (ED6) & WFDC Response (ED7)). This omission limits the readability of the Plan. It is understood that the Council proposes a Main Modification (MM) to introduce a spatial development policy.

The HBF’s interpretation of the apportionment of proposed housing allocations is set out in the Table below :-

	Residential Allocations (excluding sites with planning permission as of 1 st April 2019)
Lea Castle Village	27.5% (1,400 dwellings)
Kidderminster Eastern Urban Extension	27.5% (1,440 dwellings)
Other sites in Kidderminster	19.5% (990 dwellings)
Sites in Stourport on Severn	19.5% (984 dwellings)
Sites in Bewdley	4.0% (225 dwellings)
Rural Settlements	2.0% (115 dwellings)
TOTAL	100.0% (5,154 dwellings)

The Plan’s spatial vision focuses on Kidderminster as the strategic centre and Stourport on Severn & Bewdley as market towns. The apportionment of

housing development focuses 74.5% of allocations in Kidderminster and on two strategic sites adjacent to Kidderminster. This focus may not meet the needs of communities outside of Kidderminster. In 2016, the resident population was 56,538 in Kidderminster, 20,542 in Stourport on Severn and 13,802 in Bewdley & the surrounding rural area. The apportionment of residential allocations to Bewdley & the surrounding rural area is less than its proportion of resident population. Within the District, the rural areas have the most expensive house prices, many local people are priced out of the market. The 2019 NPPF advocates that *“to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services”* (para 78).

b) is it based on adequate evidence, consistent with national planning policy, and is it deliverable within the Plan period?

The focus of 19.5% of residential allocations in Kidderminster and 55% of residential allocations on two strategic sites north-east of Kidderminster at the former Lea Castle Hospital site owned by Homes England and an eastern extension to the town under option to Taylor Wimpey means that market capacity (the ability of a given number of developers to sell a certain number of homes in a local area each year) will be an important factor in determining the deliverability of the Plan. This factor and others will be tested in detail during Matters 4, 5 & 6 Examination Hearing Sessions.

Viability will also be a key issue in determining the soundness of the Local Plan. In plan-making, viability is inseparable from the deliverability. As set out in the 2019 NPPF, the contributions expected from development including the level & types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. should be set out in the Local Plan (para 34). As stated in the 2019 NPPF, development should not be subject to such a scale of obligations that the deliverability of the Local Plan is threatened (para 34). The Council’s 2017 Viability Assessment (IFT07) showed that brownfield sites and strategic sites were unviable unless policy requirements were flexed. Subsequently individual Viability Assessments have been undertaken for Lea Castle Village and Kidderminster Eastern Extension (ED9A, ED9B & ED9C), which will be tested in Matters 4 & 5 Examination Hearing Sessions. The 2018 Viability Assessment Update (IFT06) continues to show brownfield sites as unviable on a full policy compliant basis and 25% affordable housing provision as set out in Policy 8B (see Table 10.11). There are 58 sites proposed for allocation for housing of which 38 are brownfield. The Viability Assessment advises caution in relying on brownfield sites (para 10.49 of ITF06). An over-reliance on unviable brownfield sites will be another important factor in determining the deliverability of the Plan.

e) does it promote the development of a good mix of sites for new homes?

The mix of sites by location is limited. As set out in answers to Questions 3.1a and 3.1b above, most allocations are located in Kidderminster & Stourport on Severn and two strategic allocations. There are far fewer allocations in Bewdley and Villages in the rural area.

There is also a high proportion of brownfield sites (38 out of 58 allocated residential sites).

Under 2019 NPPF (para 68 (a)) the Council “should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved”. In Appendix 1 of Housing Topic Paper (ED3), the Council identifies 649 dwellings from sites no larger than one hectare comprising 406 dwellings on small sites proposed for allocation and 243 dwellings available on small sites included on the Brownfield Register, which is consistent with 2019 NPPF by exceeding 10% of the proposed housing requirement of 5,520 dwellings.

h) has the Plan been adequately informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development?

As set out in Green Belt Topic Paper (ED2), during the preparation of the Local Plan, the Council held various meetings with neighbouring authorities. During these meetings, the Council asked neighbouring authorities whether they were able to accommodate any of Wyre District’s development needs but no neighbouring authority indicated a willingness to assist because they are Green Belt local authorities themselves or they cannot accommodate their own needs and are looking to export some of their growth to their neighbouring authorities. Indeed as set out in Statements of Common Ground with the Black Country authorities (SD10f), South Staffordshire (SD10e) and Birmingham (SD10g) there are suggestions that any uplift above the minimum standard methodology LHN in Wyre Forest should be seen as meeting their unmet housing needs. This is an unjustified proposition. Wyre Forest District is not part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). It is incumbent on neighbouring authorities to produce evidence and to justify the accommodation of their unmet need in Wyre Forest. The Council’s proposed MM is a pragmatic response. The MM to Policy 6A(B) states “As required by the Duty to Co-operate, due consideration will be given, through a future early review of the Wyre Forest Local Plan where necessary and in accordance with the NPPF, to the housing needs of neighbouring local authorities in circumstances when it has been clearly established through the Local Plan process that these needs must be met through provision in the Wyre Forest District area. The review will consider the need for additional growth and plan appropriately for this if the need has been clearly evidenced and justified”.

3.2 a) Taking account of national planning policy on exceptional circumstances, has the need for changes to the Green Belt boundary

been established, and has due regard been paid to its intended permanence in the long term?

The need for changes to the Green Belt boundary has been established. As set out in 2019 NPPF, where fully evidenced and justified Green Belt boundaries can be altered in “exceptional circumstances” through the preparation or updating of Local Plans (paras 136 & 137). The HBF supports the findings of the Council’s Green Belt Topic Paper (ED20), which justifies the release of Green Belt land for allocation and safeguarding. However, the HBF would not wish to comment on individual sites selected for allocation or safeguarding.

Is the proposed designation of Reserved Sites likely to be adequate in this respect?

The Council propose to designate five reserved sites. This quantum of reserved sites is small.

The 2019 NPPF requires policies in Local Plans to be reviewed at least once every five years (para 33). There is also the possibility of an earlier review as set out in proposed MM to Policy 6A(B). At that time, it is likely that the LHN figure will have increased as evidenced by 2018-based SNHP and the revised standard methodology (see HBF Matter 2 Hearing Statement). The Council has identified that the capacity for residential development from brownfield sites is no longer sufficient to provide the number of homes required over the plan period. In the future, brownfield sites will continue to be a diminishing source of land supply. Under such circumstances, it is most probable that the limited quantum of reserve sites will be insufficient to achieve the permanence of Green Belt boundaries in the long term.

3.3 Having regard to the housing need figures and the spatial planning considerations above, is it justified to set 5,520 dwellings (at least 276 dwellings per year) as the housing requirement for the Plan period?

The Council has determined its housing need as 276 dwellings per annum, which totals 5,520 dwellings over the plan period. As set out in the HBF Matter 2 Hearing Statement, the Council could have been more ambitious in its calculation of housing need based on the latest demographic data and to deliver more affordable housing.

The Council proposes that its housing need and housing requirement figures are the same. However, it is important to distinguish between housing need and the housing requirement. The NPPG states that “the standard method identifies a minimum annual housing need figure. It does not produce a housing requirement figure” (ID 2a-002-20190220). So presumably the Council’s alternative approach to calculating housing need will not result in a housing requirement figure. The NPPG clarifies that need and requirement are distinct processes by stating that “housing need is an unconstrained assessment of the number of homes needed in an area. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site

allocations” (ID : 2a-001-20190220). The Council has identified an overall housing land supply of circa 6,365 dwellings (15% above the proposed housing need of 5,520 dwellings) so there is scope for both higher housing need and housing requirement figures.