

STATEMENT OF REPRESENTATIONS

WYRE FOREST DISTRICT LOCAL PLAN 2016-2036

MATTER 3: QUESTIONS: 3.1/3.2/3.3

1. EXCEPTIONAL SPATIAL STRATEGY

2. CIRCUMSTANCES

3. HOUSING REQUIREMENT

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REPRESENTATION REF: 1188945

1 Spatial Strategy

- a. The local plan is based on a traditional spatial strategy of concentrating planned growth throughout the District, focusing new development on the larger settlements where facilities and services can sustainably support the proposed housing. The settlements proposed for growth are well chosen, including the larger settlements of Kidderminster and Stourport-on-Severn, through to the smaller settlements with good facilities, such as Blakedown.
- b. The Spatial Strategy will, as a consequence, assist in supporting sustainable lifestyles, by reducing the need to travel for work / social or services for new residents.
- c. The Strategy chosen will support local businesses and facilities in the settlements selected for growth.
- d. As set out in the Housing Topic Paper (ED3) paragraph 8.5 the proposed distribution of sites meets the advice set out in paragraph 68 of the Framework.

- e. The strategy is however, heavily biased towards Kidderminster for housing delivery, with 3,740 homes allocated and to be delivered at the town, compared to 984 in Stourport-on-Severn, 225 in Bewdley and 115 in the Rural Areas, over the plan period. There is little supporting evidence or justification to demonstrate this level of provision can and will be delivered at the town.
- f. This reliance on Kidderminster to achieve the required housing delivery in the District emphasises the need for early and constraint free delivery of the remaining sites in the plan.
- g. For this reason alone, the 15% buffer is required (ED3, paragraph 10.2).

2 Exceptional Circumstances

- a. The Framework at paragraph 137 sets out the steps Authorities should take to ensure their claim of “*exceptional circumstances*” is sufficient to justify changes to confirmed green belt boundaries.
- b. The Council sets out clearly that in this local plan,
 - i. brownfield and underutilised sites are exploited to the full,
 - ii. Density requirements are optimised to limit the impact on the green belt, and
 - iii. Neighbouring Authorities, following consultation, have confirmed they cannot absorb any of the housing need to be met by this plan.
- c. As such, based on the Council’s housing requirement, exceptional circumstances do exist sufficient to justify amending current green belt boundaries (ED20, paragraph 8.5/8.6).
- d. The SA for the plan also demonstrates that the selected sites, we will deal with Blakedown in later submission papers, represents the most sustainable form of development distribution for the District.
- e. For the reasons set out at paragraph 8.23 of ED20, a modified spatial strategy focusing development to the south west of the District, away from the green belt (which covers approx. 55% of the District) is not sustainable.
- f. As a consequence, the claimed exceptional circumstances are proven.

3 Housing Requirement

- a. The plan proposes a modest annual housing requirement of 276 DPA. The plan proposes a 15% buffer on this figure, for the reasons set out at 1 e/f/g above this buffer is warranted.

- b. The requirement is soundly based and seeks to maximise housing delivery in the District. It is not the maximum requirement that could be considered, as the 2017 requirement figure is calculated to be 300 DPA, the 2018 (based on 2016 projections) calculated to be 276, and the 2020 (based on 2018 projections) is calculated to be 303 DPA. Thus the 276 is a mid-point in a range of figures that could be proposed.
- c. The plan strategy and proposed level of growth has been assessed by SA and the impacts are demonstrated to be acceptable.
- d. In terms of Affordable Housing there is a requirement for 158 DPA, whereas the plan has a delivery target of only 90 DPA, meaning that housing need will continue to grow in the plan area. There is no detailed justification within the plan as to why higher levels of affordable housing cannot be made available within the plan.
- e. Completions need to be increased from their historic rates in the District to meet the growth aspirations required by the plan, total completions running at 224 DPA (2006-2020) and affordable housing running at 83 DPA (2010-2020).
- f. Therefore, the housing requirement must be regarded as a minimum target, that should not be reduced, otherwise the upturn in delivery required by this plan will not occur.