

WYRE FOREST DISTRICT LOCAL PLAN (2016-2036) EXAMINATION IN PUBLIC

**Matter 8: Other Policies for Housing; Provision for Gypsies, Travellers
and Travelling Showpeople**

Persimmon Homes

PPS1694
Hearing Statement

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REPORT

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1 MATTER 8: OTHER POLICIES FOR HOUSING; PROVISION FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

- 1.1 This Matter 8 Hearing Statement has been prepared on behalf of our client Persimmon Homes ('Persimmon') for Wye Forest District Council's ('the Council') Local Plan 2035 ('the Plan') Examination in Public. Persimmon is the site 'Freehold' owner and developer for the Plan's 'Catchem's End' allocation at Bewdley (Policy WA/BE/3). The Statement should be read in conjunction with previous consultation responses RPS has submitted to the Council on behalf of Persimmon in relation to this Local Plan (some of which are referred to in this Statement).

8.1 (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?

- 1.2 PH only wish to comment on a single issue here, which is the self-build policy as part of emerging Policy 8D. As part of this policy, the Council indicates that on all schemes of 10 dwellings or more/greater than 0.5ha, applicants should demonstrate how the needs of self-builders have been taken into account. Beyond this, on schemes of 50 dwellings or more, there will be an expectation of self-build, as the Council considers this size of site to be most appropriate to support self-build properties.
- 1.3 Drawing on the Reasoned Justification for the emerging Policy, paragraph 8.23 of SD1 indicates that in April 2018, there was a local demand for 60 self-build plots, 40 of which on new build developments.
- 1.4 Whilst not a significant need, the Council is correct to look to the Local Plan to deal with this, however RPS does not consider that the policy is soundly framed nor gives certainty of approach.
- 1.5 In particular, RPS queries the threshold for 50 dwellings, which is not supported by any clear justification. What is the difference for example in a plan for an alternative threshold, such as 100 dwellings, which RPS notes has been applied in a number of other Local Plans.
- 1.6 In terms of consequence, the move for all schemes of 10 or more to consider self-build, as emerging schemes will first need to undertake a period of assessment to determine the need for self-build, and in other instances, look to reconfigure a scheme if the Council deem it

- necessary. RPS consider this to be an unnecessary and overly burdensome step and would suggest that this requirement for all major (10+ schemes) is removed from the policy.
- 1.7 Where schemes are considered to present a need for self-build housing, the Council should also be mindful of the impact on build times, as on-plot self-build requirements can have the perverse effect of frustrating housing delivery, which will in turn impact upon the Council's ability to sustain a deliverable supply of housing. This can manifest during the detailed stage of design process, and in RPS' view could greatly impact the ability of early delivery on smaller sites of less than 100 dwellings. This figure is again mentioned, as RPS consider that this represents an appropriate threshold for proposals to consider self-build, allowing a platform for greater opportunities to meet the need of 40 dwellings expressed in the Council's evidence. Often, such policies have introduced a figure for schemes of 100 or more to contribute towards, with 5% being a commonly suggested figure¹.
- 1.8 RPS notes that the Council's proposed allocations strategy includes a number of schemes in excess of 100 dwellings, and it would be reasonable to expect that this clutch of sites are capable of fulfilling the need for self-build properties, without impeding delivery on smaller, more immediate sites. RPS would recommend this change to the policy in order to make it effective and deliverable.

¹ Amber Valley; Huntingdonshire; Lincoln & North Kesteven; South Gloucestershire.