WYRE FOREST LOCAL PLAN, MATTER 8

Other Policies for Housing, Provision for Gypsies, Travellers and Travelling Showpeople

Campaign to Protect Rural England (Worcestershire Branch)

December 2020

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?
- 1. As set out in previous Matters we do not consider the Housing Density Policy is adequate. The policy as written does not actually make sense since 'new greenfield sites in town centres' is clearly non-sensical, something we pointed out at previous consultations on the plan.
- 2. Minimum Densities should be applied in all areas of the plan. 30 dph seems to us the very minimum sensible figure (taking account of specific cases where there are environmental constraints), but we would prefer to see figures similar to those promoted by GL Hearn of 35 dph on rural sites and 40 dph on urban sites (See our Appendix 3.1 to Matter 3).
- 3. We support policies which seek to provide adequate housing for the elderly and for others with special housing requirements, notwithstanding the difficulties we noted in Matter 7 of setting some conditions relating to people's age. Given the aging of the population profile in Wyre Forest we would suggest this should be subject to review, including the balance between C2 and C3 housing provision for the elderly.
- (ii) Do they allow reasonable flexibility to respond to site-specific circumstances?
- 4. We believe they do.
- (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?
- 5. We do not have a detailed view on this except to say we think it is essential that the target for affordable housing is delivered as part of the housing mix and a trajectory is likely to help ensure this happens. If the current trajectory is maintained (but see our comments on Matter 7.2) the frontloading of that trajectory should be linked to meeting affordable housing needs as a priority.

- 8.2 Is Policy 18B clear and consistent with Policies 6B and 6F with respect to the approach to residential infill development in villages and meeting local housing needs?
- 6. CPRE generally supports the approach to infill sites in Policy 18B

8.3

- (i) Are the Plan's policies for sites for Gypsies and Travellers and Travelling Showpeople informed by adequate evidence and consistent with national planning policy?
- (ii) What is the level of need that is likely to arise over the Plan period?
- (iii) Is there evidence to support any reliance on `turnover' of pitches?
- (iv) How will the accommodation needs of Gypsy and Traveller households that a) meet the planning definition, or b) do not meet the planning definition or are `unknown' be met?
- (v) Is provision for a transit site required in the District and if so, how should this be addressed by the Plan?
- 7. CPRE is not in a position to comment in detail. We support the provision of adequate land for GTTS needs, subject to proposals meeting the requirements of the Plan as a whole.
- 8.4 How should any needs for non-conventional housing, particularly residential caravans/mobile homes and houseboats be addressed in the Plan?
- 8. CPRE supports the current restrictive approach to Caravans and Mobile Homes (Policy 18D and 28B mainly). We concur with the Council that: 'Mobile home and caravan sites represent one of the biggest development pressures in the rural areas of the District'. We, therefore, consider it is in the interests of the environment and amenity of the District that further expansion is resisted.