



# **Wyre Forest District Council Local Plan 2016-2036**

## **Examination**

**Matter 8: Other policies for housing**  
*(Policies 6B and 6F, 8A-8E, Policy 18D and supporting text);*  
**Provision for Gypsies, Travellers and  
Travelling Showpeople**  
*(Policies 8F-G 18B, 19, 30.29, 33.17 and supporting text)*

**Wyre Forest District Council Response**

## **Contents page**

	Page No.
Response to question 8.1	1
Response to question 8.2	5
Response to question 8.3	6
Response to question 8.4	8

Appendix 1 – Affordable Housing Trajectory

## **Wyre Forest District Council**

### **Wyre Forest District Local Plan (2016-2036) Examination**

**Matter 8: Other policies for housing** (Policies 6B and 6F, 8A-8E, Policy 18D and supporting text); **Provision for Gypsies, Travellers and Travelling Showpeople** (Policies 8F-G 18B, 19, 30.29, 33.17 and supporting text)

**Q8.1(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?**

- 8.1.1 Policy 8A - Housing Density & Mix and Policy 8B - Affordable Housing Provision use the evidence of the Wyre Forest District Housing Needs Study (HOU01), the Wyre Forest Demographic Update 2018 (HOU02), five-year land supply report April 2019 (HOU03) and the Housing and Economic Land Availability Assessment 2019 (HOU04). All of the studies have been completed in line with the relevant NPPF and Planning Policy Guidance and use recognised data sets such as the 2011 Census<sup>1</sup> and the ONS Household projection data<sup>2</sup>. This is cross tabulated with district held data such housing needs survey information, the housing register and monitoring of housing site allocations and delivery. Suggested modifications are tabled at MA/8.1-7 of SD12. Policies 8A and 8B are therefore considered to be sound.
- 8.1.2 Policy 8C - Addressing Rural Housing Needs is based upon the 2018 Wyre Forest District Housing Needs Study (HOU01), together with various parish needs surveys and neighbourhood plans, where they have been completed. The Plan also follows the NPPF and PPG guidance on provision of housing in rural areas. Suggested modifications are tabled at MA/8.9-10 of SD12. Policy 8C is therefore considered to be sound.
- 8.1.3 Policy 8D – Self-Build and Custom-Build Housing has been written using data from WFDC's Self Build and Custom Build register<sup>3</sup>, the 2018 Wyre Forest Housing Needs Study (HOU01) and the Housing and Economic Land Availability Assessment (HOU04).

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<sup>1</sup> <https://www.ons.gov.uk/census/2011census>

<sup>2</sup>

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>

<sup>3</sup> <https://www.wyreforestdc.gov.uk/planning-and-buildings/planning-for-householders/self-build-and-custom-build-register/self-build-and-customer-build-register-monitoring-report.aspx>

- 8.1.4 Adjustments have been made to the policy throughout the development of the local plan. For example, at Preferred Options stage, self and custom build housing was included in a policy called 'specialist housing'. Following comments by a variety of stakeholders, this was separated out and became a policy in its own right. The policy is in line with the NPPF and the PPG on Housing Delivery and Supply. Suggested modifications are tabled at MA/8.11-14 of SD12. Policy 8D is therefore considered to be sound.
- 8.1.5 Policy 8E - Housing for Older People and Others with Specialist Housing Requirements uses the evidence of the 2018 Wyre Forest District Housing Needs Study (HOU01), Wyre Forest demographic update 2018 (HOU02), five-year land supply report April 2019 (HOU03) and the Housing and Economic Land Availability Assessment 2019 (HOU04). All the studies have been completed in line with the relevant NPPF and Planning Policy Guidance and use recognised data sets such as the 2011 Census<sup>4</sup> and the ONS Household projection data<sup>5</sup>. This is cross tabulated with district held data such housing needs survey information, the housing register and monitoring of housing site allocations and delivery. A suggested modification is tabled at MA/8.15 of SD12. Policy 8E is therefore considered to be sound.

**Q8.1(ii) Do they allow reasonable flexibility to respond to site-specific circumstances?**

- 8.1.6 Adjustments have been made to the policy 8A throughout the development of the local plan. Following a change in government policy after the Preferred Options consultation in 2017, the Council amended the Housing Needs Study using the updated guidance and policy 8A for the pre submission consultation in 2018.
- 8.1.7 The number of dwellings required for the Plan period was revised down from the previously used figure in the Objectively Assessed Housing Needs study<sup>6</sup> of 300 dwellings per year to 276 using the Standard Methodology. Paragraph 6.1 from the Housing Topic Paper (ED3 and ED3A), submitted to the inspector in June, gives a summary of why this approach has been taken by WFDC:

*The Government's Standard Method is the "starting point" – 248 dpa. However, the Council believes that this should not be the "finishing point". The Standard Method is based on the 2014-based household*

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<sup>4</sup> <https://www.ons.gov.uk/census/2011census>

<sup>5</sup>

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>

<sup>6</sup> [Local Plan review evidence base - Housing \(wyreforestdc.gov.uk\)](http://www.wyreforestdc.gov.uk/Local-Plan-review-evidence-base-Housing)

*projections. In contrast to most places in the country, using the 2016-based household projections results in a modest uplift – 276 dpa. The Council believes that the 2016-based household and 2018-based population growth data more closely reflects the realities of likely population and household growth in the district. In addition, the Council believes an increase over the Standard Method figure is justified on the basis of the need to deliver affordable housing. Finally, the Council is ambitious to do what it can to assist in the achievement of the national target of 300,000 dpa. For all these reasons, the Local Plan Policy 6A adopts a requirement figure of 276 dpa or 5,520 over the plan period.*

- 8.1.8 Following comments at Regulation 19 stage, it is proposed to modify the policy 8A as follows:

*The makeup of individual developments, their design and density will be in sympathy with the development context and existing neighbouring development. It is anticipated that new Greenfield developments will have an average density of 35 dwellings per hectare, unless it can be shown that there are strong reasons why this would be in conflict with the development context and existing neighbouring development. Individual site characteristics may mean that this level of density is not achievable on all greenfield developments and this will need to be robustly justified and evidenced by the applicant in relation to housing needs and the local context. (SD12 MA/8.2)*

- 8.1.9 The justification behind this is that the NPPF requires local authorities to set a minimum density and that 35 dwellings per hectare is considered viable for most of the sites proposed for allocation in Wyre Forest. As well as viability, the policy was informed by what stakeholders identified as being needed in the 2017 objectively assessed housing needs study<sup>7</sup> and what has been delivered over the previous 9 years in the district. The policy does allow for the density to be varied by providing a mechanism that will provide justification for lower density, especially on Greenfield sites in the district.
- 8.1.10 The Affordable Housing Provision policy (8B) has had to balance several different factors in terms of meeting need, ensuring financial viability and compliance with Government policy. For example, in the justification for the policy, it states that the 2018 Housing Needs Survey (HOU01) identified the need for 158 dwellings to be delivered annually. However, when viability was assessed and past delivery examined, it was suggested that a more realistic figure would be 90 units and that 25% should be sought on s106 sites. Again, seeking to recognise the need, balance this with government policy and ensure viability it is stated that due to the requirement for rent, 65% of units sought would be for rent

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<sup>7</sup> [Local Plan review evidence base - Housing \(wyreforestdc.gov.uk\)](https://www.wyreforestdc.gov.uk/local-plan-review-evidence-base-housing)

(including social), whilst 35% would be intermediate tenure. It also stated that viability would be looked at on a case by case basis to ensure flexibility and deliverability of schemes. In addition to the aforementioned, the following wording is to be inserted in the policy: *For 100% affordable schemes, the Council will support affordable rented units, subject to any amendments to grant funding.* The impact of the policy will be evaluated through existing continuous monitoring of site allocations, permissions and developments throughout the district and with findings reported through its Authority Monitoring Reports.

8.1.11 Alongside policy 8C, the hierarchy of development in policy 6B ensures that most of the housing is in the main urban areas of the district. The rural housing policy, however, adds further detail about when and where housing will be allowed in rural areas. Whilst policy 8C states that the main permissible developments will be for affordable or rural workers accommodation, it does recognise the need to provide some enabling market dwellings to ensure a development is viable. As with all policies, the impact of this policy will be evaluated through existing continuous monitoring of site allocations, permissions and developments throughout the district and findings will be reported through the Authority Monitoring Reports.

8.1.12 In terms of Policy 8D, the sustainability appraisal states:

The policy enables self-build and custom housing, so catering to the needs of a specific (albeit limited) group of people, some of whom may wish to build their housing communally. This policy is more supportive of this than the current plan is. It encourages a proactive approach, at the same time as balancing other policy requirements and the needs of other stakeholders, e.g. developers.

8.1.13 The sustainability appraisal has raised the issue that Policy 8E does not currently state how and where residential institutional units will be allocated and suggests modifying the policy to take a tougher stance and specify the proportion of buildings that need to be accessible. However, historically there has been an overprovision of older people's housing in Wyre Forest and therefore there is no policy requirement beyond the adaptations mentioned previously in the policy. The District Council has always referred to the Extra Care Strategy of Worcestershire County Council<sup>8</sup> for numbers of older people's housing need which had the figures updated in 2016 and covers both private and social housing provision. In addition, due to Covid, the whole provision of older people's housing, especially residential care homes, is in question and so the authority wants to be able to update the supported housing plan and research and include this in an SPD on affordable housing.

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<sup>8</sup> [https://www.worcestershire.gov.uk/downloads/file/4269/worcestershire\\_extra\\_care\\_housing\\_strategy](https://www.worcestershire.gov.uk/downloads/file/4269/worcestershire_extra_care_housing_strategy)

**Q8.1(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?**

8.1.14 In terms of the housing trajectory and affordable housing provision, the Plan does have a target of 90 dpa. It is proposed that the trajectory plan at Appendix 1 is included.

**Q8.2 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?**

- 8.2.1 The Council agrees with the Inspector that there are inconsistencies between Policies 18B and 6B and 6F which need to be rectified.
- 8.2.2 Policy 6F has a cross reference to Policy 18B under 'Providing Housing for Local Need'. This refers to existing villages, rural settlements and **other rural hamlets**. However, as currently worded, Policy 18B only refers to infill plots within the settlement boundaries. This would thus preclude any infill development within the many settlements without defined boundaries including several quite sizable villages which are washed over by Green Belt, such as Chaddesley Corbett. It is therefore suggested that the second sentence of Policy 18B is amended as follows: "Residential developments on infill plots within ~~the settlements boundaries of the three main towns and the villages~~ will be encouraged...". A subsequent amendment to the wording at paragraph 18.8 will also be required to remove the reference to "settlement boundaries" and the "main towns and villages".
- 8.2.3 This is in addition to those amendments proposed in SD12 at MA/18.1 and MA/18.2. MA/18.1 proposes an additional criterion to 18B to ensure consistency with 6B. The proposed amendment is: *Proposals for infill development within villages and other rural settlements should be to meet local needs only as set out under Policy 6b.* MA/18.2: proposes additional wording at paragraph 18.8: *It is important that such plots that become available in the rural areas are developed to meet local housing need as demonstrated through a Parish Housing Needs Survey and Housing Register. This will ensure the long-term viability and vitality of these settlements.*
- 8.2.4 Turning attention to Policy 6B – Locating New Development, this will now require additional text as there is currently no reference to 'other rural hamlets' as per Policy 6F. If other rural hamlets are added into table 6.0.3 then it is suggested that this should be within the section on Villages washed over by Green Belt. Thus, the category would be renamed 'Villages and Rural Hamlets...' A rural hamlet would be defined, in the case of Wyre Forest, as a small settlement centred around a public

house or Church. This is in order to preclude 'infill' plots coming forward in areas of ribbon development along the A450 in particular. Also, those villages washed over by Green Belt do not currently list infill development as a suitable form of development. It is proposed to add text into table 6.0.3 as follows: Villages covered (washed over) by Green Belt – additional bullet point in final column '**Infill development as defined in Policy 18B**'.

8.2.5 It is also suggested that Policy 6F Sustaining Community Facilities and Services, bullet point 4, needs to be amended to read: *Where there is a need for new housing in existing villages and **rural settlements...***

8.2.6 If the aforementioned amendments are made to Policies 6B, 6F and 18B the inconsistencies should be resolved.

**Q8.3(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?**

8.3.1 The current policy, 8F, Gypsy and Traveller Site Provision, is based upon the evidence from the 2014 Gypsy and Traveller Accommodation Assessment (HOU05 and HOU06). This needs to be updated, following the completion of the 2020 Gypsy and Traveller Accommodation Assessment by Arc4, October 2020 (ED15). The 2020 Assessment is in line with both the 2015 PPTS, Planning Policy for Traveller Sites, guidance and s124 of the Housing and Planning Act 2016.

**Q8.3(ii) What is the level of need that is likely to arise over the Plan period?**

8.3.2 Policy 8F states that there is an overall need of 17 pitches over the plan period until 2036, with no immediate requirement in the first five years of the plan. However, the 2020 GTAA states that there is the following need:

	Cultural Need	PPTS need
2020-2024/25	14	3
2025-2029/30	6	2
2030-2035/36	15	8
Total plan requirement	35	13



- 8.3.3 Considering the findings of the updated Gypsy and Traveller Assessment, it is suggested that policy 8F be modified to read:

*Further small-scale site to meet the indicative need of 13 pitches to 2036 will be allocated during the lifetime of the Local Plan.*

**Q8.3(iii) Is there evidence to support any reliance on `turnover' of pitches?**

- 8.3.4 Turnover relates to the number of pitches that are expected to become available for occupancy. This is an important supply-side consideration when assessing pitch need. However, analysis only includes expected turnover on public sites as this is referenced in (former) CLG guidance and more accurate data on changes in pitch occupancy is likely to be available. Although there is likely to be turnover on private sites, the ability of households to move onto private sites may be more restrictive (for instance the site may be restricted to a particular family) and less likely to be recorded.
- 8.3.5 Household survey data indicates that 4 households had moved onto their pitch in the previous 5 years. However, only 1 household was planning to move in the next 5 years. Averaging these two figures results in a 5-year anticipated turnover of 2.5 pitches or 0.5 pitches each year. This analysis would suggest that around 8 pitches are likely to come available for occupancy over the plan period.
- 8.3.6 It should be noted that the overall level of need (51 cultural and 29 PPTS) is before any allowance is made for turnover on pitches. Additionally, the analysis considers the potential expansion/intensification of existing sites and the potential for new sites to provide more pitches.
- 8.3.7 Factoring in turnover (8 pitches over the plan period), potential expansion/regularisation (4 pitches) and potential new sites (4 pitches) reduces the overall plan period need to 35 cultural and 13 PPTS.

**Q8.3(iv) How will the accommodation need of Gypsy and Traveller households that a) meet the planning definition, or b) do not meet the planning definition or are `unknown' be met?**

- 8.3.8 The PPTS need identified by the 2020 Gypsy and Traveller Accommodation Assessment is not dissimilar to the 2014 need, with the main difference being the need to provide 5 pitches in the period 2020/21 to 2029/30. Officers are currently working with the Gypsy and Traveller community and landowners to identify potential sites. Possible locations for consideration include land off Zortech Avenue (LI/10) and part of the Lea Castle wider site. Therefore, we anticipate that we will

meet the need identified over the local plan period through these allocations, existing site extensions and windfalls. However, if the wider cultural definition is to be provided for, then an early review of the plan may need to take place.

8.3.9 Under the PPTS the council should provide pitches for those meeting the planning definition. However, there is no government guidance on how to meet the needs of those who do not meet the planning definition (other than by implication they should be met as part of overall housing need) even though they may need to live on a pitch.

8.3.10 Therefore, as a minimum, the council are seeking to address the needs of those meeting the planning definition and will also endeavour to meet the overall cultural need for pitches.

**Q8.3(v) Is provision for a transit site required in the District and if so, how should this be addressed by the Plan?**

8.3.11 The 2020 GTAA identifies that there is a need to provide 4 transit pitches in the district. According to the report, this obligation could be met through temporary stop over orders, negotiated stop over rights or provision of a permanent site. The use of temporary stop over orders and/or negotiated stop over rights would be the preference of the authority due to the low number of transit pitches required each year. It is anticipated that the proposed sites for temporary stop over sites and / or negotiated stop over rights would be several Wyre Forest District Council car parks and parks, used by Gypsy and Travellers in the past.

**Q8.4 How should any needs for non-conventional housing, particularly residential caravans/mobile homes and houseboats be addressed in the Plan?**

8.4.1 The Gypsy and Traveller Accommodation Assessment 2020 (ED15) states: The consensus from those interviewed is there is a need for more residential moorings in the area. Establishing an exact number is not possible but the CRT (Canals and Rivers Trust) report that in general there are not enough moorings for residential use. Development options were mentioned including the use of land adjacent to the fairground site and the CRT is encouraging landowners to build marinas. It is recommended that the council hold further discussions with the CRT regarding the provision of additional moorings in the district.

8.4.2 It is the intention of colleagues in planning policy to work with those in housing to further establish the needs and identify how these can be met. The Council is also intending to complete a Statement of Common Ground with the Canals and Rivers Trust before the hearing sessions commence.

## Appendix 1 – Affordable Housing Trajectory

	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Yr 10
	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
Actual dwellings completed (net)	117	8	90	54						
Target	90	90	90	90	90	90	90	90	90	90
Projected completions (net)					150	193	171	196	168	108
Cumulative completions	117	125	215	269	419	612	783	979	1147	1255
Years Left in Plan	19	18	17	16	15	14	13	12	11	10

	Yr 11	Yr 12	Yr 13	Yr 14	Yr 15	Yr 16	Yr 17	Yr 18	Yr 19	Yr 20
	2026/27	2027/28	2028/29	2030/31	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36
Actual dwellings completed (net)										
Target	90	90	90	90	90	90	90	90	90	90
Projected completions (net)	129	98	82	72	78	60	45	35	35	32
Cumulative completions	1384	1482	1564	1636	1714	1774	1819	1854	1889	1921
Years Left in Plan	9	8	7	6	5	4	3	2	1	0

## Appendix 1 – Affordable Housing Trajectory

