<table>
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<tr>
<th>MAKING THE MOST EFFECTIVE AND SUSTAINABLE USE OF LAND</th>
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<tbody>
<tr>
<td><strong>SOC146</strong> To deliver places that are more sustainable, development will make the most effective and sustainable use of land, focusing on:</td>
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<td>* Housing density</td>
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<tr>
<td>* Reusing previously developed land</td>
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<tr>
<td>* Bringing empty properties back into use</td>
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<tr>
<td>* Making only exceptional use of the best and most versatile land</td>
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<tr>
<td><strong>1. Housing Density</strong></td>
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<td>Housing development in South Worcestershire will make the most effective and efficient use of land, with housing density designed to enhance the character and quality of the local area, commensurate with a viable scheme and infrastructure capacity.</td>
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<td>Housing density will be higher on sites with a high level of accessibility, including sites located in or close to city and town centres, or close to public transport stations.</td>
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<td>The form and density of housing will vary across larger sites, in response to current and future accessibility and other characteristics of each part of the site. Variations in density across a site should be used to develop different character areas.</td>
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<td>High quality design will enhance amenity through housing density levels that also secure adequate internal and external space, dwelling mix, privacy, and sunlight and daylight to meet the requirements of future occupier.</td>
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<td>Subject to the above density criteria, on sites allocated for housing or for mixed use that includes housing, the following broad indications of appropriate average net densities shall apply:</td>
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<td>(a) For sites within the city of Worcester, urban extension allocations in all three districts, and allocations for more than 100 new dwellings in larger towns, development should achieve an average net density of 40 dwellings / ha</td>
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<td>(b) Worcester city centre and larger town centres development of mainly flatted units should achieve an average net density of 75 dwellings / hectare</td>
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<td>(c) Where urban extensions and other large developments abut open land or sensitive locations such as conservation areas, listed buildings, areas of archaeological importance, or resulting in changes to green belt land, a higher density may be considered.</td>
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To be in accordance with NPPF, the plan needs to be amended. The SWDP needs to be amended by including a new policy towards making the most effective and sustainable use of land. The policy has 4 key strands relating to housing density, use of brownfield sites (previously developed land), bringing empty properties back into use, and the use of the best and most versatile (agricultural) land. **Housing density** – the amendment is consistent with Framework paragraph 47 (last bullet point) as the amendment sets out the LPAs’ approach to housing density to reflect local circumstances. It is informed by evidence about residential densities, and seeks to provide sufficient guidance to support development that makes efficient use of land whilst the criteria at the start of the policy provide sufficient flexibility to allow development to be sensitive to the context provided by the surrounding area, and to deliver quality development. **Use of brownfield land** – sets a plan wide target, consistent with Framework paragraph 111. This target is lower than recent delivery rates in recognition of the need for some housing development to be on greenfield sites in the future, in order to maintain the 5 year plan.
**Making the Most Effective and Sustainable Use of Land**

Interest or areas of ecological/biodiversity value, their design should reflect the sensitivity of those areas; immediately adjacent development densities should be adjusted downwards as appropriate to ensure that impact on those areas is minimised, whilst maintaining the overall average density of the site.

(d) In other towns, or on sites of less than 100 dwellings, average net densities for new development should be an average net density of 30 dwellings/ha.

Windfall housing developments should be assessed against the density criteria relevant to their location and the character of the built and natural environments around them, including heritage assets.

2. Use of Brownfield Sites (Previously Developed Land)

In aiming for 50% of housing development in the plan period to be located on brownfield sites, the plan:

(a) maximises the amount of allocations on previously developed land that is available or developable,

(b) prioritises the development of allocations and windfall sites on previously developed land subject to the maintenance of the 5 year housing land supply

(c) includes housing development as part of wider regeneration packages for the Worcester Opportunity Zones where this does not undermine the Zones' ability to support local economic prosperity or the vitality and viability of Worcester City Centre

Development proposals on brownfield development sites will

i. protect and enhance the biodiversity on or related to the site, informed by contemporary survey data

ii. complement, enhance and utilise where possible the historic environment subject to policies towards heritage assets and the built environment

3. Bringing Empty Properties Back into Use

Policy SWDP 2 includes bringing long term empty homes back into use as specific part of the housing supply in South Worcestershire to meet housing provision to 2030 and reduce the need to find additional land for housing.

Subject to infrastructure capacity, and environment policies, development proposals for housing land supply.

**Bringing Empty Properties Back into Use** is consistent with Framework paragraph 51 and paragraph 21 (priority areas for regeneration) and paragraph 80 (where green belt encourages the recycling of derelict and other urban land). Policy SWDP 2 includes allowance for homes brought back into use to contribute towards the housing supply in the plan period. This is not an area of housing market failure with a high level of empty homes. Nevertheless, a proportion of the long term empty homes in the plan area can contribute towards the housing supply if they are brought back into use, in line with national policy published in Laying the Foundations: A Housing Strategy for England.

The Government has recently announced that it is not to carry forward proposals to Amend permitted development rights for the change of use of B class buildings used for business, industry and storage. Instead it now relies on new policy in the framework paragraph 51 to encourage LPAs to ‘normally approve’ such applications for a change of use if there is a local housing need.

The new policy towards the best and most versatile land is consistent with paragraph 112, recognising the importance of land for food security and at the same time, need to take a holistic view of sustainable development, when
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<td>the change of use of long term empty, non-residential properties to other beneficial use will be approved where:</td>
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<td>a) it does not undermine the economic strategy set out in this plan; and</td>
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<td>b) in the case of proposed housing development where this contributes to the 5-year housing land supply.</td>
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4. **Use of the best and most versatile land**

Taking into account the economic and other benefits of the best and most versatile agricultural land, development which would result in the permanent loss of this high quality land will be refused, unless it can be demonstrated that there is no alternative land of a lower quality which could reasonably be used. Where development is permitted on the best and most versatile land, it should use the lowest grade of land suitable for development except where the sustainable development objectives of the Plan would be better met by using land of a higher grade.

In addition, the effect of high quality agricultural land loss on farm economics and management will be considered. Where development would fragment farm holdings planning permission will be granted only where mitigation is possible e.g. the land can be incorporated into surrounding holdings and there is no severance of buildings from the land.

**Written justification**

**Policy consistency with the Plan's principles and objectives**

**Principle** - development, with respect to its scale and type, will always be commensurate with, and appropriate to, the size and characteristics of the host settlement and its capacity to assimilate change in accordance with the settlement hierarchy.

**Objective:** To prioritise the re-development, including mixed uses, of brownfield land within the urban areas in order to aid the regeneration of the city/town centres.

**Principle** - Where appropriate capacity exists, priority will be given to the use of brownfield land within and adjacent to existing settlements in advance of the release of greenfield land.

**Objective** To enhance biodiversity, geodiversity, landscape quality, water quality and protect the highest quality agricultural land.

considering development, including the urban extensions.

It is unnecessary for the plan to duplicate policy within the Framework.

The proposed reasoned justification provides the explanation for this policy and the alternatives considered and rejected.
1. Residential density

In line with the National Planning Policy Framework, the local authorities set out their own approach to housing density through this policy to reflect local circumstances. The emphasis is on ensuring that developable land, which is a finite resource, is used effectively and efficiently to provide maximum flexibility in meeting local housing needs and also ensuring that in doing so, development does not adversely affect the character and appearance of existing cities, towns and villages:

Higher densities do not necessarily mean low quality, and parts of the older town areas and villages are built to high densities. They can make development more sustainable by making more efficient use of land, concentrating development and bringing people and services and facilities closer together reducing the need to travel, subject to the capacity of existing or planned infrastructure being able to support the scale of development. This intensification can lead to closer proximity of users and uses and may have adverse impacts such as noise and disturbance, loss of privacy, more traffic movements and pressure on parking spaces. Low densities however mean that more land has to be used to deliver the housing needed, putting pressure on our valuable and attractive countryside. A balance has to be struck between the two, so setting absolute density targets is not likely to be the best way of getting the best quality housing in all locations.

Evidence on local housing densities underpins the policy’s minimum average net density levels. High level of accessibility afforded by sites being located close to facilities and services in city and town centres, or near to public transport stations, justifies higher densities in those locations. These levels are subject to the density criteria set out in the policy which ensure the plan provides flexibility and responsiveness to local circumstances, including infrastructure capacity to support the development. Site density will be measured in terms of the number of dwellings per hectare based on the net developable area.

It is important to consider the impact of development proposals on the character of the local area as well as the impact on the quality of new housing. Planning applications will need to demonstrate how the extant density of the surrounding area informs the scheme design and how the proposals enhance the area. Further information from local characterisation studies for example can also support consistent decision-making through development management processes.
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Appropriate levels of housing provision can be made without adversely affecting the character and amenity of a settlement. For example, “soft” development edges and open space, landscaping and buffer areas can be appropriate to help preserve the setting of adjacent sensitive locations such as conservation areas, listed buildings, areas of archaeological importance and areas of biodiversity interest.

#### 2. Use of previously developed land

Consistent with NPPF the policy focuses on the effective use of land by encouraging reuse of land that has been previously developed, provided that it is not of high environmental value. This is also in line with the requirements of the 2005 UK Sustainable Development Strategy, which identified planning as being at the heart of sustainable development and reflected a desire to see the development of brownfield land before previously undeveloped sites and increased housing densities on development sites.

The reuse and recycling of previously developed land should be prioritised wherever possible when housing proposals are being considered, except where such sites have naturally regenerated to the point where they have developed a value for biodiversity or contribute significantly to levels of local amenity. Under those circumstances, inappropriate / unsustainable development will be resisted. Likewise, there are opportunities to incorporate the historic environment into regenerated sites, subject to the policies for the protection and enhancement of heritage assets.

The South Worcestershire 2010 Annual Monitoring Report demonstrates that in 2009 - 2010, 82% of new and converted homes and 72% total amount and type of completed floorspace were built on previously developed land. This position is likely to change in future years as currently available brownfield sites become built out. This will increase the pressure on greenfield sites to deliver local housing, employment and service needs, including the main allocated urban extensions.

In recent years a proportion of new housing development was on residential garden sites within the urban areas, and previously counted as brownfield. Since June 2010 residential gardens are no longer included in the definition of previously developed land. For the purposes of 5 year supply calculations, windfalls now exclude development on residential gardens.

The Councils have used the evidence in the Strategic Housing Land Availability Assessment to identify brownfield sites to allocate, and the housing monitoring information to identify
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Completed and committed brownfield sites. This evidence informed the choice of the 50% target for reuse of brownfield land for housing. The target is realistic, as the brownfield land identified as available or developable is not sufficient to meet the housing provision requirement to 2030, and a proportion of new development will be on greenfield land.

Allocated Opportunity Zones in Worcester City are the main reservoirs of brownfield land with significant capacity to bring about regeneration and accommodate new mixed use development but their regeneration is not to be housing-led.

### 3. Bringing empty properties back into use

Justification for bringing long term empty homes back into use is set out under Policy SWDP 2. Long term for empty homes means vacant for more than six months. Bringing other properties back into use is part of a wider approach to regeneration, improving the built environment, consistent with delivering a supply of housing and the economic strategy.

### 4. Best and Most Versatile Land

Fertile soil is a strategic asset. Strategic issues relating to climate change and food security strengthen the need to preserve agricultural and horticultural capacity, where possible. It is important to protect the best and most versatile land because of its flexibility. National planning policy however does not preclude development on the best and most versatile land. Where significant development of agricultural land is demonstrated to be necessary through allocation, local planning authorities have sought to use areas of poorer quality land in preference to that of a higher quality. This is one reason why the largest allocation at Worcester is on Grade 3 land.

In identifying land for development that cannot be met through urban capacity, the Councils were aware of the need to protect the best and most versatile agricultural land, but have needed to be balance this against the other environmental constraints, to achieve plan objectives in line with national planning policy. Agricultural land will be lost to development, but by applying this policy the loss can be minimised.

Development on the best and most versatile land will only exceptionally be permitted. If there is a choice between sites of different grades, the lowest grade should be used. However, there may be cases where, for example, lower grade land has greater biodiversity, landscape or heritage importance and should be retained in preference to higher grade land. Moreover, some losses can be mitigated. ‘Planning for Soils in Worcestershire’ 2011 provides a menu of
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options and delivery mechanisms to protect Worcestershire’s soils. This highlights the opportunity for mineral working to be returned to agricultural use or achieving an upgrade of Agricultural Land Classification to mitigate for best and most versatile land lost elsewhere to development.

The loss of high quality agricultural land could affect the viability of an existing farm holding and put its future agricultural use at risk. Also, such a loss could lead to the fragmentation of a farm holding into smaller units, thereby creating a demand for more farm buildings and possible damage to landscape and nature conservation interests.

**Alternative options: Density**

1. **Blanket density for SWDP area**
   A simple blanket approach to density across the SWDP area would provide certainty to developers and could be set at a level calculated to achieve the required level of housing supply across the plan period. However, this would not be sensitive or flexible enough to achieve the high level of design and environmental quality required in the plan. It is likely that it would not meet local needs in various circumstances and would have an adverse impact on the character and amenity of more sensitive environments.

2. **No density policy**
   This would allow for maximum flexibility for developers and would enable them to develop at levels consistent with market demands, thus ensuring the viability of their investment. However, it would be difficult to resist development densities that would have an adverse impact on adjacent environments. Not having the reassurance of a density policy would hamper the SWDP achieving its housing supply requirements in certain places, where a higher density would be appropriate but where developers may not wish to provide even the minimum requirement. Not being able to expect and request levels of housing density will undermine the local planning authorities' ability to be certain of delivering sustainable allocations and ensuring that land is being used in an efficient and effective manner.

3. **Not having a separate SWDP density policy**
   Amendments could be made to SWDP 26 to incorporate references to density, to avoid the addition of a further policy to the document. This would allow for a more streamlined
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approach and would effectively mainstream density alongside other elements of good design. However, this will make SWDP 26 more bulky and less user-friendly and will not necessarily allow for the degree of flexibility a separate policy would encourage.

#### Alternative options: Brownfield land

1. **A higher target** – a more ambitious target risks not delivering the 5 year housing land supply, and sites then allowed or permitted may be less sustainable

2. **A lower target** risks greater use of greenfield land which is a scarce resource, either agricultural land or green network.

3. **No target** – there would be a policy void in the absence of a national or local target on the use of previously developed land, and a lack of means to guide decision makers regarding the effective use of land.

#### Alternative options: Best and Most Versatile Land

1. Total protection – prevents development, but undermines the ability to develop at the most sustainable locations and deliver necessary growth

2. No protection is inconsistent with national policy

### Glossary

**Best and Most Versatile Land** – agricultural land classified by the Department for Environment, Food and Rural Affairs as being of Grades 1, 2 and 3a

**Net developable area**: For housing this is the area of the development site for the dwellings and ancillary uses such as estate roads, drive ways, garages / parking spaces, and gardens, but it excludes for example strategic landscaping, water balancing areas, play areas and non-dwelling uses.