

Meeting the Housing Needs of Communities

Background Paper

Draft

7/12/12

This Background Paper was prepared on behalf of the South Worcestershire Authorities (Malvern Hills District Council, Wychavon District Council and Worcester City Council) as part of the South Worcestershire Development Plan (SWDP) process. It is one of a suite of papers to inform the development of the SWDP.

This Background Paper has been prepared to help improve understanding of the issues contributing to the development of the chapter on Meeting the Housing Needs of Communities.

This Background Paper is in draft form, it has not been formally endorsed by, and therefore does not necessarily reflect the views of, the South Worcestershire Authorities.

Further information and details of the South Worcestershire Development Plan and its development can be found on the following website: <http://www.swdevelopmentplan.org/>

Every effort has been made to verify and check the contents of this paper including all figures and tables. However the South Worcestershire Authorities cannot accept any responsibility for errors

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1. Introduction: the purpose of this document and the policy it supports

This background paper explains the approach taken by South Worcestershire Local Authorities to:

- boost the supply of affordable housing, including through the use of rural exception sites, and accommodation for older people,
- ensure that land is used effectively and density is appropriate to its location,
- provide a greater mix of homes in terms of size, scale, tenure and type to help meet the needs of local communities,
- establish the level of traveller sites and
- clarify their position regarding rural workers dwellings and replacement dwellings.

It is a technical paper that will be part of a suite of documents to inform readers on the progress of the emerging development plan to submission stage.

The resultant policies will be integral in the determination of planning applications for housing and mixed uses where housing forms a part. The policies aim to improve the social well-being of local communities and support the economic thrust of the development plan.

2. Policies included within this paper:

SWDP13: Effective Use of Land

SWDP14: Housing Mix

SWDP15: Meeting Affordable Housing Needs

SWDP16: Rural Exception Sites

SWDP17 Travellers and Travelling Showpeople

SWDP18: Replacement Dwellings in the Open Countryside

SWDP19: Dwellings for Rural Workers

SWDP20: Housing to Meet the Needs of Older People

3. Background policy context:

National Policy:

National Planning Policy Framework (NPPF):

The National Planning Policy Framework (NPPF) was published on 27th March 2012. This supersedes all PPG's and PPS's including PPS3, PPS7 and a number of Circulars. The NPPF contains 12 core planning principles which should underpin both plan-making and decision taking.

Paragraph 14 clarifies that at the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

Para 47 enables local planning authorities to set out their own approach to housing density to reflect local circumstances.

The NPPF (Para 50) requires local planning authorities to deliver a wide choice of high quality homes; to plan for a mix of housing based on current and future trends and needs of communities and to establish the level of need for affordable housing with preference for on-site provision unless an alternative site or off-site contribution is robustly justified.

Annex 2: Glossary defines affordable housing to include social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. On all new grant funded affordable housing schemes, RP's are not permitted to offer the new homes as social rent and are obliged to offer them as either 'affordable rent' or shared-ownership.

The provision of affordable housing on rural exception sites is permitted by Para 54 and may include some market housing where it would facilitate the provision of significant additional affordable housing to meet local needs.

Para 51 promotes strategies for bringing empty homes back into use. Further guidance is available at: <http://www.communities.gov.uk/documents/housing/pdf/2073102.pdf>

Para 55 restricts the building of new isolated homes unless there are special circumstances including for essential rural workers dwellings and the re-use of rural buildings.

New Homes Bonus:

In April 2011 the Government introduced New Homes Bonus to incentivise housing supply. The Government match funds the additional council tax raised for new homes and empty properties brought back into use for the following 6 years, with an additional £350 pa (£1260 over 6 years) for new affordable homes.

Travellers:

The Government issued Planning Policy for Traveller Sites in March 2012. For the purposes of the national Planning Policy, travellers mean "gypsies and travellers" and "travelling showpeople". Annex 1 of the Policy provides a definition of gypsies and travellers, of travelling showpeople and pitches and plots.

The Planning Policy states that local planning authorities should use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.

The Planning Policy also states that local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.

In producing their Local Plan, the Planning Policy says that local planning authorities should:

- (a) identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets
- (b) identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15
- (c) consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)
- (d) relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density
- (e) protect local amenity and environment

The Planning Policy also says that criteria should be set to guide land supply allocations where there is identified need. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.

Gypsy and Traveller Accommodation Needs Assessments: Guidance

The assessment of Gypsy and Traveller accommodation needs is a statutory requirement under section 225 of the Housing Act 2004.

Government Guidance on Gypsy and Traveller Accommodation Needs Assessments (GTAA's) was issued by Communities and Local Government (CLG) in October 2007.

Guidance stated that responsibility for carrying out GTAA's lay with local housing authorities, although sub-regional studies were advocated. The data collected through the GTAA process should enable the local authority or partnership to identify:

- The number of Gypsy and Traveller households that have or are likely to have accommodation need to be addressed, either immediately, or in the foreseeable future;
- A broad indication of where there is a demand for additional pitches;
- The level and types of accommodation required for this need to be suitably addressed (e.g. socially rented/private site provision, transit sites or stopping places, bricks and mortar housing);
- The level of unauthorised development which, if planning permission was not approved, was likely to swell the scale of need.

Neighbourhood Planning:

Neighbourhood planning is a new right for communities introduced through the Localism Act 2011. Neighbourhood planning empowers communities to shape the development and growth of a local area through the production of a neighbourhood development plan, a neighbourhood development order or a Community Right to Build Order.

Neighbourhood development plans will become part of the local statutory development plan and will form the basis for determining planning applications in that area.

A neighbourhood development order enables the community to grant planning permission for the development it wishes to see.

Community right to build enables local people to bring forward small scale, site specific, community-led developments. Development proposals will need to meet minimum criteria and have the agreement of more than 50 per cent of local people that vote through a community referendum. It will be for communities to determine the type of development they want to see, including the type and tenure of any housing, including affordable housing. Any benefits from any development - such as capital or rental receipts - will remain within the community. In order to be able to use the right, members of a community will need to set themselves up as a corporate body with the purpose of furthering the social, economic and environmental well being of the local community.

County Information

Worcestershire County Research and Intelligence Unit (R & I):

The R and I website includes Area Profiles which give key statistics at district, ward, and electoral division levels. The information includes annual estimated updates on population, age structure, house prices and council tax banding. The R and I unit has also produced a background paper on demographics to inform the development plan production. Other information, such as household composition and tenure dates back to the 2001 Census and presumably will only be updated when the statistics collected during the 2011 Census are released.

Other relevant reports include the following:

Report on House Prices (Jan 2011)

The County Council website includes reference to clg's district quarterly updates on e.g. mean house prices.

Worcestershire Migration Report

The report summarises net migration figures from within the UK and from outside the UK plus a total net migration since 2001 for the six Local Authorities within Worcestershire. In general terms they reveal that:

Over the last 10 years an average of around a net 670 persons per annum are moving into the South Worcestershire. In general there is a substantial level of in-migration into the districts of Malvern Hills and Wychavon, and substantial out-migration from Worcester City.

The net inflow from internal migration has decreased markedly, especially in the last three years. The decreases are especially noticeable in Wychavon and Malvern Hills.

It is also noticeable that international migration changed from a net outflow in 2001-05 to a net inflow for the years 2005-09, then a net outflow again in 2009-10. This fluctuation is probably due to economic factors, which affect the level of in-migration from overseas, although there is no equivalent decrease in international migration in either the national or the regional figures.

Worcestershire Demographic Report 2005 – 10 (dated 8th July 2011)

This states that in mid-2010, the population of Worcestershire was an estimated 557,400. The county has a lower proportion of young children (0-4) and young adults (18-34) and a higher proportion of people aged 45-plus than are seen regionally and nationally. ONS mid-2008 trend-based population projections suggest that by 2031 Worcestershire is projected to have a population of almost 607,000, representing an increase of around 51,600 on the 2008 figure, or just over.

Table 2 – Mid-2010 Population Estimates – Selected Age Groups (thousands)

Area	Children 0-15	%	Working Age 16-64	%	Older People 65+	%	All Persons
Malvern Hills	13.1	17.4%	44.5	59.0%	17.8	23.6%	75.4
Worcester City	17.8	18.7%	62.6	66.1%	14.4	15.2%	94.8
Wychavon	20.6	17.6%	71.9	61.5%	24.5	21.0%	117.0
South Worcestershire	51.5	17.9%	179.0	64.3%	56.7	19.7%	287.2
Worcestershire	100.8	18.1%	349.2	62.6%	107.4	19.3%	557.4
West Midlands	1,055.4	19.3%	3,462.4	63.5%	937.4	17.2%	5,455.2
England	9,766.3	18.7%	33,861.4	64.8%	8,606.3	16.5%	52,234.0

Source – ONS mid-year estimates, 2010

From the most recent estimates in mid-2010, in South Worcestershire 18.1% of people are aged 15 and under, whilst around 19.7% of people are 65 or over. The age structure of South Worcestershire is older than both the West Midlands region (in which 17.2% are 65 and over) and England (in which the figure is 16.5%). Proportions of older people are noticeably lower in Worcester City and indeed are below the national and regional averages, whilst the rural districts, particularly Malvern Hills, have much higher proportions of residents over 65.

This also further illustrates the lower percentage of children that live in the county. Again, there is an urban/rural split within Worcestershire, with higher levels of children in Worcester City and most notably Redditch.

This information combined with the projected population increase being concentrated in the older age groups (if using a trend based forecast) indicates the importance of providing accommodation suitable for older people. This will need to be reflected by appropriate housing mix in the SWDP allocations and the wording of the SWDP policy to encourage such provision.

For Worcestershire generally the report forecasts that much of the projected household growth (over 80%) is due to an increase in One-person households. The number of households with just one person living in them is projected to rise by over 35,000 during the 2008-31 timeframe, increasing the number of One-person households in the County by almost 50%. Age breakdown reveals that increases in One-person households are greatest in the 65-plus age group, but also occur among younger ages which do not have a projected rise in population numbers. The increase in One-person households is therefore due to changes in social and lifestyle factors, and not just due to increases in population.

Table 20 – Projected Percentage Household Change in Worcestershire by Household Type, 2008-31

Household Type	2010	2031	2010-31 Change	Percentage Change
One Person	73,100	105,500	32,300	44.2%
One family and no others: Couple, no dependent children	77,100	91,000	13,900	18.1%
One family and no others: Couple, one or more dependent children	42,900	39,900	-3,000	-7.0%
One family and no others: Lone parent	11,900	16,300	4,400	36.9%
A couple and one or more other adults, no dependent children	14,900	9,100	-5,800	-38.9%
A couple and one or more other adults, one or more dependent children	6,400	4,800	-1,600	-25.4%
A lone parent and one or more other adults	2,200	2,500	300	13.9%
Other households	9,500	8,500	-1,000	-10.7%
All Households	238,000	277,500	39,500	16.6%

Source – CLG 2008-based Household Projections

Table 20 shows that much of the projected household growth is due to an increase in One-person households. The number of households with just one person living in them is projected to rise by over 32,000 during the 2010-31 timeframe, increasing the number of One-person households in the county by almost 45%, and representing over 80% of the total household increase.

The number of Couple households, when both those in which the couple are the only adults in the household and those in which other adults are present, are projected to grow by about 3,500 between 2010 and 2031. Further breakdown of couple households reveal that the largest increase is in Couple households with no other adults and no dependent children, which has a projected increase of almost 14,000 (over 18%). Other types of couple households are projected to decline in Worcestershire. The number of Lone Parent households is also projected to increase, by over 4,700 when those households with other adults also present are taken into account.

Table 21 below shows the increase in One-person households split by age group. The biggest growth is in One-person households aged 65-plus is in line with the large projected increase in population in this age group. Number of One-person households in the 75-plus age group is particularly high, and is projected to rise by over 20,000 (almost 90%) over the 2010-31 period, representing over 60% of the total projected increase in One-person households.

Table 21 – Projected Change of One-Person Households in Worcestershire by Age of Household Representative, 2008-31

2010 Households	2031 Households	2010-31 Change		Percentage Change
15-24	1,800	2,000	200	10.2%
25-44	15,600	20,700	5,100	32.9%
45-64	20,700	24,300	3,600	17.5%
65-74	11,900	14,900	3,000	24.8%
75-plus	23,100	43,600	20,400	88.2%
All Ages	73,100	105,500	32,300	44.2%

Source – CLG 2008-based Household Projections

However, it is noticeable that the 25-44 and 45-64 age groups also have a significant projected increase in number of One-person households. These age groups do not show substantial increases in terms of projected population, and in fact have a projected decline, suggesting increases in One-person households here are due to changes in household composition.

The projected growth in One-person households is therefore due to a number of social and lifestyle factors. For example, people living longer and outliving their partner for a longer period of time, people choosing to marry later in life, and therefore spending longer living alone, or due to the separation from a spouse or partner.

Worcestershire Housing Strategy 2011 – 2016:

The Worcestershire Housing Strategy is a countywide strategy that all six District Authorities in Worcestershire have signed up to. It is a comprehensive document but the following extracts from the executive summary provide the key areas for the SWDP to focus on and help deliver the outcomes desired by the Housing Strategy.

“The vision of the strategy is to deliver;

“The right home, at the right time, in the right place”

This means that we want every household in Worcestershire to be able to access housing that suits their needs and circumstances when they need it.

This is particularly challenging with the reductions in public expenditure and wide ranging Government policy reforms such as housing, health & social care and welfare benefit changes.

To develop this strategy we have reviewed evidence about what we already know about our local housing markets and key findings include;

- Increasing population due to birth rate and in-migration with an increasing proportion of older people many of whom live longer.
- An undersupply of suitable, decent and affordable housing
- Issues around the funding of infrastructure requirements
- Under utilisation of existing stock e.g. empty homes, under occupation of socially rented housing
- Need to improve property standards and combat fuel poverty
- Increased needs for many vulnerable people including the homeless, older people, young people, people with chaotic lifestyles, those fleeing domestic abuse, people with dementia, physically disabled, sensory impairment, people with learning disabilities or mental health issues, minority groups including Gypsies & Travellers”.

Delivery of rural housing can be difficult to achieve and some rural housing needs are not being adequately met in Worcestershire. These areas require additional and appropriate affordable housing, as without it, the provision of an equitable supply of affordable homes in

rural communities is unlikely to be realised. A recent study has been carried out to review the way rural enabling is provided across the county to improve the outcomes achieved for our rural communities and the key findings are reflected within this strategy.

There is some positive action being taken in the county through the planning process to secure allocations of affordable housing on new developments. In most cases, however, these are focussed on larger sites where planning thresholds can be applied, although planning policies are being reviewed to address this. The consequence is that despite affordable housing being a local priority, there are significant challenges in meeting both general housing needs and providing for people who need support”.

The key areas for this chapter of the SWDP to help implement the WHS are housing mix and the provision of affordable housing. Housing mix is important to provide a wide range of housing that meets the needs of the area and to provide choice to local communities with regard to price, tenure, type and size of housing – which is in accordance with the mission of the Housing Strategy.

The provision of affordable housing, including through the Rural Exceptions Policy is also a key area for both the SWDP and the Housing Strategy, with the aim to maximise the provision of affordable housing whilst mindful of the viability of developments to ensure that sites come forward.

Worcestershire Sustainable Community Strategy:

A Strategy has been produced for the county as a whole but included are District Priorities. For the 3 South Worcestershire Authorities and of particular relevance to this paper these include

Worcester Alliance:

- To improve the quality of life for local residents across the city as a whole and with a focus on areas of highest need.
- To work creatively and innovatively in partnership with local communities to tackle local issues and meet local needs and build resilience.
- To have a range of quality housing which meets local needs and supports cohesive neighbourhoods

Malvern Hills Partnership:

- To reduce the impact of rurality on our local communities
- To tackle issues associated with inequalities, including health inequalities

Wychavon Strategic Partnership Priorities

- Delivering housing that meets local needs
- Supporting older people

Worcestershire Older Persons Housing Report (April 2009):

In Worcestershire by 2031 there will be a 52% increase in those over 60 and a 155% increase in those over 85. Rates of growth vary between Districts with higher growth in Wychavon and Malvern Hills. In absolute terms, Wychavon and Wyre Forest have the biggest population of older people.

Although life expectancy has increased the period of poor health in later life when care may be needed has also risen, 4.3 years for men and 5.9 years for women. Those with dementia are likely to increase from 7,118 now to around 21,000 by 2025; a 200% increase. The number of people who need help with one or more daily activities like going to the toilet or getting out of bed is predicted to rise from 15,728 to 25,632 by 2025. There are 745 households over 50 on housing waiting lists with an accepted housing need, there are also a small but growing number of older people with learning disabilities to cater for.

Levels of owner occupation amongst older people in Worcestershire are very high at over 80% in the 55-74 age range underlining the importance of planning for all tenures but also the possible role of equity schemes.

Worcestershire LIP: Summary of Strategic Priorities



South Worcestershire Evidence:

Strategic Housing Land Availability Assessment (SHLAA)

The South Worcestershire Local Authorities jointly produce a Strategic Housing Land Availability Assessment, in line with Government guidance. Generally the assessment is updated annually, and contains information on the potential housing land within the three local authority areas. It is a technical document, which appraises the location of potential housing sites in terms of their general location (i.e. whether they are in sustainable locations), and their suitability, availability and achievability for housing - BUT it does not assess the detailed planning merits of housing sites- this is done as a separate exercise through the development plan process.

The initial methodology for the production of the SHLAA was jointly approved in 2007. SHLAA publications have then been produced in 2008, 2010, and 2011 (update). The next update is due to be published December 2012.

Strategic Housing Market Assessment (SHMA)

The SHMA (April 2007) and Local Housing Needs Report for the three South Worcestershire Districts (Sept 2007) conclude that the current thresholds and percentages of development required for affordable housing on open market housing sites will need to change if sufficient affordable housing is to be delivered to meet future needs in South Worcestershire. The technical data on a range of indicators such as affordability/ housing need has been updated on an annual basis by the County Council's Research and Intelligence team.

In 2011 GVA were commissioned to review the SHMA, to update the methodology in the light of any changes in Government guidance, and update key areas of statistics to underpin policy decisions on the Development Plans of all six Worcestershire Authorities. The Worcestershire SHMA (2011) also includes an overview for each of the six Districts within Worcestershire.

As required by national guidance the Worcestershire SHMA assessed both the current backlog and future arising household need for affordable housing – see SHMA figure 7.3. This establishes that south Worcestershire will be required to provide for a net annual affordable housing need of approx 657 dwellings per annum over the next five years in order to both clear the existing waiting list backlog and met future arising household need.

The table below shows the level of income required in the 6 districts to access market and social housing.

Figure 7.13: Income required to access housing in market / Social housing

Authority	Market Housing			Social Housing
	Income required to purchase LQ property (assumed 3.5 mortgage multiplier as per DCLG Guidance)	Income required for 2 Bed Lower Quartile private rented property	Income required for 1 Bed Lower Quartile private rented property	Income required for average social rented property
Bromsgrove	£38,375	£27,600	£18,960	£15,106
Malvern Hills	£40,243	£26,100	£21,600	£16,807
Redditch	£30,343	£26,400	£20,400	£14,214
Worcester City	£32,143	£26,400	£21,600	£14,459
Wychavon	£38,571	£26,400	£20,640	£16,216
Wyre Forest	£29,057	£22,560	£17,520	£15,040

Source: GVA, 2011

This demonstrates that in south Worcestershire an average household income of nearly £37,000 is required to purchase a lower quartile property whilst rental of an average 2 bed apartment requires an income of £26,300 (assuming 25% is spent on rent) and an income exceeding £21,280 is required to afford a 2 bed apartment at Affordable Rent levels. 31% of households in south Worcestershire are unable to afford to rent an Affordable Rented one bed apartment and just over 50% of households in south Worcestershire earn less than £30,000.

The South Worcestershire authorities consider that because Affordable Rent was introduced in February 2011 as a new tenure concept, its effectiveness in providing a tenure that meets particular needs has not been fully tested. It is appreciated that it is part of the government's aim to generate additional income for RP's to develop further in future. However, as the table below (from the SHMA 2012 report) indicates there are a proportion of households who are unable to afford to access Affordable Rented properties. Therefore it is the local authorities view that on sites where there is open market housing as well as affordable then the emphasis should be on the provision of social rented housing (the original and cheapest affordable housing tenure), with Affordable Rented and Intermediate housing provided in lesser amounts or on alternative sites such as those coming through the Rural Exceptions policy.

Figure 7. 11: Proportion of Households Unable to Afford Affordable Rent Housing

Authority	% Unable to Afford 80% Market Rent, 1-bed Apartment	% Unable to Afford 80% Market Rent, 2-bed Apartment	% Unable to Afford 80% Market Rent, 3-bed House	% Unable to Afford 80% Market Rent, 4-bed House
Bromsgrove	25%	35%	43%	59%
Malvern Hills	31%	41%	51%	51%
Redditch	30%	41%	50%	77%
Worcester City	33%	43%	53%	68%
Wychavon	29%	39%	48%	64%
Wyre Forest	34%	34%	45%	63%

The Worcestershire SHMA reconfirms the anticipated expansion in the number of older person households with the amount of those aged 65 and over living alone to increase significantly and stresses the need for policy makers to understand the varying needs of this sector of society including those aged 85 and over (para. 8.13). Para 8.19 identifies that issues such as poor health and increasing need for care and support for those in their later years will need to be catered for.

Affordable Housing Development Viability Study (Sept 2008) Adams Integra

The report (and its update – see below) provide evidence to support affordable housing policies. They consider all aspects of development viability and the impact of potential affordable housing requirements on viability, to establish the maximum amount of affordable housing that can be delivered from market housing allocations.

The key recommendations of the study are as follows:

- A headline policy target of 40% affordable housing (applicable generally at a site size threshold of 15 or more dwellings).
- A simple sliding scale of affordable housing requirements to be set out in respect of sites of 5 to 14 dwellings, so, a threshold for on-site provision of 5 dwellings.
- To require all residential developments to contribute to affordable housing thereby optimizing contributions on an equitable basis. This could be achieved by requiring appropriately judged financial contributions on sites of 1 to 4 units and on-site provision on sites of 5 and above.

- To develop policy wording which sets clear targets as a basis for the practical, negotiated approach, acknowledging the relevance of site viability.

Supplementary Market Review and Property Prices Report (July 2010) Adams Integra

Considered house prices, build costs, level of sales etc to help assess the level of affordable housing provision on development viability. It concludes that the previously recommended affordable housing targets and policy scope discussions remain appropriate.

Focussed Sub-Regional Review of the Regional Spatial Strategy Evidence Base to Inform the South Worcestershire Development Plan

(not sure how relevant this will be to housing chapter policies – need to check through)

Responses to Public Consultation on SWJCS Issues and Options – November to December 2007

In response to the Issues and Options paper there was overwhelming support for setting targets for the sizes and types of housing sought in residential development which take into account the character of the local area (Issue 13, Options 1 and 2). There was also strong support for promoting homes which can be extended more easily to meet changing needs (Option 4). There was very little support for allowing the building industry to decide the mix of house types that should be provided (Issue 13, Option 3). Responses included the needs of the elderly and young people should be catered for, 'and' a supply of smaller homes should be maintained'. The 'needs of other groups should be taken into account, e.g. students. There was recognition of a potential conflict between improved standards of design, using sustainable construction techniques versus the need to provide a large quantity of homes. There was public support for improving the quality, flexibility and adaptability of housing further supported by the Sustainability Appraisal. There were questions over the principle and feasibility of mechanisms for developers of market housing to contribute to improving existing local housing. It was suggested that people should be encouraged and not forced to move to more suitable housing (e.g. downsizing). Concern was expressed about encouraging Lifetime Homes and the subsequent potential impact on turnover and choice.

In response to the Issues and Options paper there was considerable public support for all new housing to make a contribution towards affordable housing and for the Joint Core Strategy to set a percentage target for the proportion that should be affordable (Issue 13, Options 1 and 2). Thresholds need to take account of local requirements and the ability of smaller developers to deliver economically viable development sites.

There was significant support for identifying Gypsy and Traveller needs and broad locations where additional provision should be made (Issue 15, Option 1), but the majority of opinion was against Local Authorities using compulsory purchase powers to deliver sites in appropriate locations (Option 2). Responses stressed the need for consultation with the gypsy and traveller community, Parish Councils and the local community, with the aim of integration with the local community. Sites should be small scale and of different types including transit sites, and should be allocated through consultation rather than confrontation. Furthermore, encouragement should be given to private investment rather than the public funding of sites.

The SWDP team used these comments and other evidence to help draw up the policies for inclusion in the next stage of the process.

Responses to Public Consultation on SWJCS Preferred Options Paper – September to October 2008

Responses to Public Consultation on Site Allocations and Policies Development Plan Document, September 2009 to May 2010

This information gathering exercise looked to examine sites within the urban and rural areas of South Worcestershire to accommodate new homes and associated facilities such as employment, shopping, health, education, community and open space. Earlier consultations focused on 'strategic' larger locations for housing, jobs, and community facilities as part of the (former) Joint Core Strategy. This time round it concentrated on 'smaller' sites to feed into the (former) Site Allocation Plan. Of particular relevance to this paper was the consideration of the provision of sites for Gypsy and Travellers.

Gypsy and Traveller:

Recognise need for more sites

No more sites wanted

Limit size of sites to 6 pitches

Prefer public owned sites

Travellers should provide their own sites

Other:

Create mixed housing communities where older residents can down size within the area they have lived in most of their lives.

The South Worcestershire housing needs assessment indicates that there is a much higher need for additional affordable housing provision than would be provided by relying on the PPS 3 requirements.

Responses to Public Consultation on Preferred Options Document – September to November 2011

Housing for Older People:

There were many concerns raised about the lack of focus of the plan on providing housing for the elderly in particular. It was stated that policies do not actively address the needs of the elderly, including those who require care and that there should be a proportion of housing for older persons on all sites with a presumption for bungalows. Locate housing for older people within walking distance of services.

In response officers drafted a new policy on 'Housing to Meet the Needs of Elderly People' which was subject to the significant changes consultation (see below).

Effective Use of Land:

Concerns raised over density, making efficient use of land whilst protecting character of rural and more sensitive areas. A new policy was subsequently drafted to cover these issues in line with the NPPF which enables local authorities to set out their own approach to housing density to reflect local circumstances. This policy was subject to the significant change consultation in its entirety.

Housing Mix:

More emphasis should be given to ensuring an appropriate variety in types, sizes and costs of homes. Better balance needed in housing stock with more affordable provision for first time buyers, social housing and smaller accommodation to suit an ageing population. Evidence base not up to date. Insufficient evidence for the 10% low cost market housing required on sites of 5 or more.

Officers conceded this latter point and the policy was amended to remove reference to low cost market housing. The policy was subject to significant change consultation in its entirety including reference to the updated Worcestershire SHMA.

Affordable Housing:

The percentage target of 40% affordable on all sites of 5 or more units is contrary to the evidence provided in Adams Integra report. This recommends a sliding scale with a maximum target of 40% on sites of 15 or more dwellings. The policy was subsequently amended to reflect the position given in the evidence, and this element of the policy was subject to significant change consultation.

Developers have knowledge of the market but should only have a contributory role to the overall mix and not a determining one. Furthermore concern that Contingent Deferred Obligations would be required. The policy wording was subject to minor changes to overcome these valid points.

Rural Exception Sites:

General support for this policy but suggested that sites should be contiguous with development boundary unless separated by say church, school or other amenity land. Concern that policy required reasonable access to both local services and public transport and that 20% maximum of market housing on rural exception sites would thwart many sites coming forward. The policy was subject to minor changes to clarify the position.

The policy was subject to a minor change

Gypsies, Travellers and Travelling Showpeople:

There is a significant unmet need for gypsy sites in Malvern Hills District. The policy was subsequently amended to require 30 pitches to be provided within the Worcester urban extensions and this element was subject to significant change consultation.

Greater recognition that Wychavon had made steady progress in approving new sites and expansion of existing sites to meet the need identified through the GTAA and WMRSS Interim Statement. The current validity of the GTAA questioned due to it being carried out in 2008.

These areas of the policy were subject to minor changes and the reasoned justification amended to clarify that a new GTAA would be required to inform the pitch provision for the period from 2017.

Replacement Dwellings in the Countryside and Re-Use of Agricultural Buildings:

Consultees considered that this policy should be split and the re-use of agricultural buildings covered elsewhere – now in the rural employment policy. Some debate on the 30% increase but is around what could be achieved through PD rights and so comfortable with this figure. Concern that no reference made to agricultural conditions if for an agricultural worker – this reference now added.

All of these were minor changes and the policy was not subject to the significant change consultation.

Dwellings for Rural Workers

Quite a lot of support for the policy but need to explain the need for the occupancy condition, make reference to our own functional and financial tests because of the loss of PPS7, cross

reference to live work policy and need to define recently. Minor changes made to the policy to cover these aspects.

The policy was not subject to the significant change consultation.

Responses to Significant Changes Consultation – August to September 2012

Effective Use of Land:

Policy is too prescriptive, insufficient flexibility to conserve and enhance the significance of heritage assets. 50% brownfield target is considered optimistic.

Officers considered the representations but have not made any further changes to the policy wording because the policy is sufficiently flexible to enable lower densities in more sensitive areas whilst encouraging the efficient use of land as allowed by the NPPF.

Housing for Older People:

Replace all references to 'elderly people' with 'older people' and 'very elderly' with 'those aged 85 and over' which are the recognised terms. Minor change made to the policy to remedy this.

Question why housing for the elderly should be delivered primarily in Worcester and on all urban extensions. Minimum of 60 bed spaces required for C2 facility to operate successfully and be financially viable. Sustainable location criteria for C2 housing in conventional sense is of less relevance – instead use of tailored transport for residents and development of range of on-site services. Specific locations should be allocated in the plan for C2 housing. Policy not supported by robust evidence and is contrary to government initiatives to retain older people in their existing homes for as long as possible.

The national issue of an ageing population is well-documented and South Worcestershire is no exception, in fact as the recently released Census figures indicate the area has higher than the national average of those aged 65 and over. Therefore, to avoid tackling the issue by not providing a positively framed policy would be contrary to national policy – both housing and planning. Further evidence has been quoted in the reasoned justification. However, the policy is criterion based and does not make specific allocations. Various approaches need to be used to help meet the housing needs of older people and to provide choice. Urban extensions, towns and villages with access to services and/or transport are preferable locations for C2 housing for older people. However, greater flexibility has been included in the policy where it can be clearly demonstrated that the benefits of the scheme to the local community significantly outweigh the less sustainable location.

Housing Mix:

No direct reference in development plan to self-build homes which are an increasingly important element of the housing market. The policy was amended to address concerns that it was too prescriptive but does include reference to encourage the provision of more affordable-sized homes of all tenures and to include custom-build homes (e.g. self-build) as appropriate to the local need and suitability of the site.

Concern that there could be a proliferation of HMO's particularly in Worcester, unless control against over concentration in local areas. Minor changes to policy to reflect this and reasoned justification includes further clarification of HMO's.

Objection raised to the conversion of detached houses only to hostels was not supported by officers because of the potentially harmful impact on residential amenity of those sharing a party wall.

Affordable Housing:

General support but some opposition to sliding scale proposed. Officers considered this is in line with the evidence base and most effective way of achieving affordable housing on sites whilst recognising the potential impact on site viability, particularly on the smaller sites. No further change proposed.

Occupation of new affordable housing in rural areas should be subject to local connection criteria as is the case now – minor change agreed.

Travellers and Travelling Showpeople:

Policy amended to refer to travellers and travelling showpeople as per national policy. Table updated to show the number of pitches granted planning permission since 2007 and the number of pitches remaining to be allocated. Support for suggestion that new sites should be up to 10 pitches.

Sustainability Appraisal (SA)

Sustainability considerations informed the content of the SWDP from the start, through the scoping and testing, and the way that the results of the sustainability appraisals at regional and local levels have helped to shape the plan.

The Housing Background Paper provides a detailed analysis of the impact of the SA on the direction and changes to policy including those covered by this paper. However, some information is also included here.

In summary the SA found that the housing to meet the needs of communities SWDP PO policies were supportive of community and housing aims of the SA, generally neutral impact on the environmental aims but importantly no key negative sustainability effects.

The SA of the significant changes considered that some changes did not fundamentally change the SA assessment but for the changes to the affordable housing policy it concluded that:

The amended policy may lead to a reduction in the amount of affordable homes provided on the smaller sites. However, by relaxing the requirement, the policy is likely to increase the feasibility of smaller developments, which may then be more likely to proceed. The effects of this change are uncertain from an IA perspective and should be closely monitored. Should it be found that the policy is resulting in a significant effect on housing affordability, it should be reviewed, and also in light of any changes to the economic situation that might improve or further worsen development viability.

For the policies on replacement dwellings and rural workers dwellings the SA concluded that:

As appraised in 2011, current policy approach still supports SA objectives for housing and communities by allowing the provision of housing that supports/ enable rural based dwellings. Where proposals are associated with a specific rural business/ industry, positive effects are enhanced and are more likely to be realised in the long term by supporting work/home co-locations; improving business viability. Effects for environmental objectives are predominantly neutral. Some minor positive effects for transport, climate change objectives are possible in the long term by reducing the need for commuting.

For the two new policies the SA concludes that:

Effective Use of Land:

Policy strongly supports the majority of SA objective aims, with particular long-term benefits for the SA objectives on housing, economy, infrastructure, travel and landscape. The policy

focuses on ensuring suitable housing densities (set at different levels for urban, urban edge and rural environments), the reuse of previously developed land, the return of empty properties, and minimising use of agricultural land. There is also an emphasis on design quality and protection of heritage and ecological/biodiversity value.

Key Positive Sustainability Effects

- Positive effects for housing, through delivering sustainable housing consistent with local character.
- Positive effects for communities through regenerating existing settlements.
- Positive effects for economy through returning empty properties to productive use.
- Positive effects for infrastructure through maximising existing properties and encouraging development in areas where existing infrastructure exists.

Key Negative Sustainability Effects

- Uncertain effects for air quality as may increase congestion in urban areas. This will need to be considered on a case by case basis.

Housing to Meet the Needs of Older People:

This new policy will enable the provision of extra care housing and supported housing for elderly people where it is most needed and in locations with the appropriate facilities, transport and services to meet the needs of the elderly. This will have especially positive effects for the strengthening communities objective and affordable housing objective. The housing will be provided on allocated and windfall sites, therefore will have no additional impacts on biodiversity, landscape etc. than is identified for the plan as a whole.

Key Positive Sustainability Effects

- Significant positive effects for strengthening communities and housing, both short and long term.
- Positive effects also for economy, infrastructure, health and transport SA objectives.

Key Negative Sustainability Effects

- None identified.

References and Web Links

National Planning Policy Framework (2012)	http://www.swdevelopmentplan.org/?s=National+Planning+Policy+Framework
Gypsy and Traveller Accommodation Assessment for the South Market Housing Area of the West Midlands Region (March 2008)	http://www.swdevelopmentplan.org/?s=Gypsy+and+Travellers
CLG Planning Policy for Traveller Sites (march 2012)	https://www.gov.uk/government/publications/planning-policy-for-traveller-sites
Affordable Housing Development Viability Study Update – Adams Integra (2010)	http://www.swdevelopmentplan.org/?page_id=391
Affordable Housing Development Viability Study – Adams Integra (2008)	http://www.swdevelopmentplan.org/?page_id=391
Proposed Significant Changes to the 2011 Preferred Options Consultation	http://www.swdevelopmentplan.org/?s=Proposed+Significant+Changes+to+the+2011+Preferred+Options+Consultation
SWDP Preferred Options consultation document – Sept to Nov 2011	http://www.swdevelopmentplan.org/wp-content/uploads/2011/09/swjcs_PO.pdf
Issues and Options Public Consultation – November to December 2007	http://www.swdevelopmentplan.org/wp-content/uploads/2011/09/swjcs_issues_options_paper.pdf
Preferred Options Paper Public Consultation – September to October 2008	http://www.swdevelopmentplan.org/wp-content/uploads/2011/09/swjcs_PO.pdf
Sustainability Appraisal	http://www.swdevelopmentplan.org/wp-content/uploads/2011/09/SWDP-SA-Report-Integrated-Appraisal-FINALwith-attachments.pdf