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Contents
1 Introduction

What is this document?

1.1 This document has taken account of the Inspector’s findings as a result of the examination in public (Appendix One) and was formally adopted by the City Council on 11th December 2007. It is a Development Plan Document and forms part of the Development Plan for Worcester, which also includes the Regional Spatial Strategy.

1.2 This Balanced Housing Market document reviews the allocated housing sites, assesses the need for more housing allocations and how the release of land should be managed, and addresses issues concerned with affordable homes. It does not replace all the Local Plan policies, some of which will now be saved until their role can be reviewed. It does not provide a policy background for the more strategic consideration of how much housing land will be required to meet housing growth during 2011-2026 associated with the Regional Spatial Strategy targets, as the options for such growth are currently under review and will be considered as part of a Core Strategy.

1.3 Development Plan Documents are statutory documents and as such must be prepared following specific procedures outlined in Table 1.1 ‘Development Plan Document preparation process’.
Table 1.1 Development Plan Document preparation process

<table>
<thead>
<tr>
<th>Step</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Evidence gathering</strong></td>
<td></td>
</tr>
<tr>
<td>* Reg 25</td>
<td>Prepare issues and alternative options in consultation</td>
</tr>
<tr>
<td>* Reg 26</td>
<td>Public participation on preferred options</td>
</tr>
<tr>
<td>* Reg 27</td>
<td>Representations on preferred options</td>
</tr>
<tr>
<td></td>
<td>Preparation of submission DPD</td>
</tr>
<tr>
<td>*Reg 28</td>
<td>Submission of DPD</td>
</tr>
<tr>
<td>* Reg 29</td>
<td>Representations on submitted DPD</td>
</tr>
<tr>
<td></td>
<td>Pre examination meeting</td>
</tr>
<tr>
<td></td>
<td>Independent Examination</td>
</tr>
<tr>
<td></td>
<td>Inspector’s Binding Report</td>
</tr>
<tr>
<td>Reg 36</td>
<td><strong>Adopted Document</strong></td>
</tr>
</tbody>
</table>

* Town and Country Planning (Local Development) (England) Regulations 2004
As a result of adoption the following saved policies in the City of Worcester Local Plan adopted in 2004 have been superseded:

- H3  Allocated Housing Sites
- H4  Phasing of Allocated Housing Sites
- H5  Windfall Housing Site
- H6  Housing Land Review
- H7  New Housing Developments: House Types and Density
- H9  Allocated Housing Sites: Provision of Affordable Housing
- H10 Windfall Sites: Provision of Affordable Housing
- H11 Affordable Housing Schemes
- H12 Affordable Housing Schemes - Occupancy Conditions
- H15 Sites for Travelling People

Policies H1, H2, H8, H14 and H15 in the City of Worcester Local Plan 1996-2004 have not been saved and therefore are deleted.
Introduction
2 Background

2.1 A statement of consultation was produced which outlined the consultation stages that have taken place in the production of this document. An earlier report “Housing Issues in Worcester” was produced in October 2005, as part of a wider pre-consultation exercise, to provide a public debate on the main housing issues in the city. The issues were included in a report for consultation and in a series of exhibition roadshows that toured different wards in the city during November 2005. There was also publicity on housing issues in a newspaper supplement in the Worcester Evening News, and on the council website, with the opportunity throughout to fill in a questionnaire on housing topics.

2.2 A further report informed by responses received was published as a “Preferred Options” report in March 2006. A consultation on that report took place over a six week period. The nature of the consultation and responses received are outlined in the Statement of Consultation.

2.3 The policies in this report relate to the spatial planning of housing provision, as guided by Town and Country Planning legislation, and the requirement to provide policies for the Local Development Framework (LDF), which is part of the new planning system that will eventually supersede the Local Plan. In particular it is concerned with policies for new housing provision, or the change of use of existing buildings to or from housing. For more information on the new Local Development Framework system, please refer to the city council website at www.worcester.gov.uk or telephone the LDF policy team on 01905 722554. You can also email queries to ldf@worcester.gov.uk. Hard copies of documents produced by the Council can be obtained from the planning section of the City Council.
Background
3 Vision and Policy Aims

3.1 Worcester is part of the West Midlands Region for local authority planning and housing purposes. The distribution of funding for housing is also based in part on priorities contained within the Regional Housing Strategy, adopted in June 2005. Taking into account the City Council’s statutory duties in terms of planning and strategic housing, its community strategy, regional planning and housing policies, and government policy for housing, the vision for the housing policies in the Local Development Framework can be summarised as:

“to provide the policy background for ensuring a balanced housing market for the city which will contribute to the social, environmental and economic quality of life for citizens and visitors.”

3.2 The policy aims are:

- to meet the strategic housing targets to 2011 for Worcester City, contained in the Regional Spatial Strategy, and related to the existing Worcestershire Structure Plan (2001)
- to maximise the use of previously developed land and buildings for housing where they meet the principles of sustainable development.
- to ensure that a wide choice of housing is made available, in terms of dwelling size and tenure.
- to ensure that the city’s housing needs are met in sustainable locations, without loss of valuable open land, and with due regard to the environmental impact
- to ensure that a proportion of new housing provision meets the needs of households identified as being within housing need
- to encourage inclusive, mixed communities in all areas.
- to contribute to safe and well designed housing in quality environments throughout the city
- to protect and where possible enhance existing housing areas.
- to contribute to economic progress within the city.
- to ensure that where possible the location of housing development reduces the need to travel, particularly by private car, and that residents have access to a range of transport choices.
Vision and Policy Aims

3.3 This Development Plan Document is one element of the Council’s role in housing provision in the city. It also has strong links to other policy areas such as the Empty Homes Strategy, work with adjacent councils on Choice Based Lettings and Supporting People, and other initiatives embraced within the Housing Strategy for homelessness and support for the private rented sector.

Picture 3.2 Social housing at Warndon Villages
4 The Main Issues and Policies

4.1 A series of housing issues and preferred options were outlined in the earlier report for consultation (see paras 2.1 and 2.2).

Land Supply: Background information:

4.2 Targets for the amount of new housing for Worcester from 1996 to 2011 are contained in the Worcestershire County Council Structure Plan 2001, although these are now superseded by new housing targets in the Regional Spatial Strategy (June 2004). The Regional Spatial Strategy seeks to regenerate the Major Urban Areas by promoting a higher growth of housing in the metropolitan areas, and lower growth outside of these areas, including in Worcestershire. The Strategy covers the period to 2021. The City Council will need to ensure sufficient housing land supply to meet these targets, but the targets are seen as a maximum that should not be exceeded by the council.

4.3 This document is based on the analysis of housing supply in Worcester contained within the Housing Land Monitor 2006 produced by the City Council. The Housing Land Monitor compares housing targets contained in the adopted Worcestershire County Structure Plan (June 2001) and the Regional Spatial Strategy with housing completions, and housing commitments in terms of dwellings under construction, with planning permission, and land allocated in the adopted City of Worcester Local plan. The City Council has also updated its Urban Capacity Study in 2005 and collaborated with the County Council on a review of sub-regional housing supply to 2026 as part of the Regional Spatial Strategy Phase II review.

4.4 New draft Government guidance contained in a consultation document (Draft Planning Policy Statement 3 (PPS3) December 2005) suggests that local planning authorities will, in the future, have to ensure that there is sufficient housing land identified and available for a five year supply, and that land for a further 10 years beyond this can be earmarked, although not necessarily allocated formally. This is more onerous than previous government guidance which states that sufficient housing land should be shown on the proposals map (that is allocated for housing) to meet at least the first 5 years land supply. This should be reviewed and rolled forward at least every 5 years (see the Government’s Planning Policy Guidance 3 (PPG3) para 34).
The Main Issues and Policies

Regional targets for Worcestershire

4.5 Table 4.1 ‘Regional Spatial Strategy Housing Targets, 2001 - 2021’ below illustrates the Regional Spatial Strategy housing targets for Worcestershire, from 2001-2021.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Worcestershire</td>
<td>1900/annum</td>
<td>1200/annum</td>
<td>1000/annum</td>
</tr>
</tbody>
</table>

Source: Policy CF3, West Midlands Regional Spatial Strategy

4.6 Government advice\(^{(1)}\) is that housing targets in Development Plan Documents must now run from 2001 rather than 1996, and must be in line with the Regional Spatial Strategy policy which for Worcestershire requires gradual decline in the rate of housing growth. Until these targets for Worcestershire are allocated between District Councils, they will be divided up in the same proportions as the current Structure Plan housing targets. Worcester City was allocated 18.7% of the County target in the Structure Plan 2001-2011, (that is, 5,250 dwellings out of 28,100). On this basis the overall housing targets for Worcester City are shown in Table 4.2 ‘Housing Targets for Worcester City, 2001-2021’.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Worcestershire</td>
<td>100.0%</td>
<td>11,400 (1900 x 6 yrs)</td>
<td>4,800 (1200 x 4 yrs)</td>
<td>10,000 (1000 x 10 yrs)</td>
</tr>
<tr>
<td>Worcester City</td>
<td>18.7%</td>
<td>2131 (355 x 6 yrs)</td>
<td>896 (224 x 4 yrs)</td>
<td>1870 (187 x 10)</td>
</tr>
</tbody>
</table>

(1) Advice contained in former Housing and Planning Minister Keith Hill's letter to the Regional Assembly of 15 June 2004

4.7 As the table above shows, for Worcester City this results in a target of gross dwelling completions of 355 per annum from 2001 to 2007, falling to 224 per annum from 2007-2011, and 187 per annum thereafter till 2021. The figures to 2011 will be shown on a “housing trajectory” in the Annual Monitoring Report 2007 which monitors the Local Development Framework.

4.8 This Development Plan Document only runs to 2011. The City Council cannot effectively allocate land beyond this date for two reasons:
The Main Issues and Policies

i. the regional housing targets contained in the Regional Spatial Strategy which run to 2021 have only been allocated to County and Metropolitan level, and have not yet been allocated to district council level.

ii. Worcester is now very built up, and most available land has been allocated for future land uses.

Some additional housing land that will be required for a fifteen year supply will inevitably have to be found beyond the city boundary. Worcester is not a self-contained housing market, and surrounding areas therefore look towards Worcester for housing, and also provide housing for former Worcester residents.

4.9 Worcester City Council is working jointly with Malvern Hills and Wychavon District Councils to produce a Joint Core Strategy for South Worcestershire. This will set the strategic housing targets and the need for additional housing allocations.

Evidence gathering started in January 2007. Worcester is defined as a “sub-regional focus” within the Regional Spatial Strategy, although the implication for this role on housing and employment growth within the city has not yet been decided. This will be considered as part of the partial review of the Regional Spatial Strategy which commenced in 2006. The Government Office for the West Midlands has advised that they would not expect to see allocations beyond 2011 at this stage so as not to prejudice the Regional Spatial Strategy partial review.

Comparison of targets with completions

4.10 The overall housing target for 2001-2011 is 3027. Completed dwellings for 2001-2007 were 2131 leaving a balance of 896 dwellings to be provided between 2007-2011. This is an annual average of 303 dwellings/annum. Government advice says that any previous under or over provision in relation to allocations prior to 2001 should not be taken into account in considering provision from 2001. This means that the high housing completion rates in Worcester between 1996 and 2000 do not now count towards our 2011 target. Table 4.3 ‘Progress on meeting the regional planning targets, 2001-2011 at 1.4.06’ below shows progress on meeting the new RSS targets from 2001.

Table 4.3 Progress on meeting the regional planning targets, 2001-2011 at 1.4.06

<table>
<thead>
<tr>
<th>RSS targets applying structure plan proportions 2001-2011</th>
<th>3027</th>
</tr>
</thead>
<tbody>
<tr>
<td>Completions 2001-2006</td>
<td>1249</td>
</tr>
<tr>
<td><strong>Balance required 2006-2011</strong></td>
<td><strong>1778</strong></td>
</tr>
</tbody>
</table>

4.11 Table 4.4 ‘Dwelling Supply: How the balance can be met’ below shows how the balance of the housing requirement can be met. The allowance for allocated sites is based on a review of existing allocations and progress on implementation. The Worcester Porcelain mixed uses site was granted permission for 356 dwellings in June 2006 but is included as a potential mixed use site (without planning permission) in Table 4.4 ‘Dwelling Supply: How the balance can be met’.
The Main Issues and Policies

Table 4.4 Dwelling Supply: How the balance can be met

<table>
<thead>
<tr>
<th>Position at 1 April 2006</th>
<th>No. of dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Balance of dwellings to be found 2006-2011</td>
<td>1778</td>
</tr>
<tr>
<td>Under construction at 1/4/06</td>
<td>474</td>
</tr>
<tr>
<td>With planning permission at 1/4/06</td>
<td>926*</td>
</tr>
<tr>
<td>Windfall allowance 2006-2011</td>
<td>- Large sites 40**</td>
</tr>
<tr>
<td></td>
<td>- Small sites 220**</td>
</tr>
<tr>
<td></td>
<td>- Replacements 88**</td>
</tr>
<tr>
<td>Allocated sites (without planning permission)</td>
<td>- Brownfield 252#</td>
</tr>
<tr>
<td></td>
<td>- Mixed use 321***</td>
</tr>
<tr>
<td></td>
<td>- Greenfield 251</td>
</tr>
<tr>
<td>Total potential supply 2006-2011</td>
<td>2572</td>
</tr>
<tr>
<td>Difference of supply over requirement</td>
<td>794</td>
</tr>
</tbody>
</table>

* Discounted by 2% to allow for non-implementation
** The allowance for the final year is excluded to allow for implementation
# Brownfield sites discounted by 10% to allow for non-implementation
*** Worcester Porcelain site now has planning permission for 356 units but not granted until June 2006

Calculation of the need for 5 years of site allocations

4.12 The figures above show that dividing the total potential supply, of 2572, by the annual average requirement of 303 dwellings per annum (see para 4.10) will give a 9 year (8.5) supply of housing.

4.13 Another way of calculating the annual supply required, advised by the Government Office for the West Midlands is to deduct completions and windfall allowances from the overall requirement for the period 2001-2011. Thus:

- Overall requirement 2001-2011 = **3027**
- Completions 2001-2006 = 1249
- Windfall allowance 2006-2011 = 435
- Total balance remaining = **1343**
- Annual rate remaining = **269** / annum 2005-2011
Worcester is likely to meet the first phase of the regional target for 2001-2007. The target is 2131 dwellings, of which 1249 were built by April 2006, 474 were under construction and a further 926 had planning permission (discounted figures), a total of 1727. There is a potential over supply of 794 units by the end of the plan period.

**Brownfield and Greenfield sites**

The adopted Local plan seeks to ensure that Government guidance on sustainable development is met and that housing sites are considered in sequence, with preference being given to development on previously-developed (brownfield) sites, before greenfield sites. Thus this document defines potential housing sites in terms of their greenfield or brownfield status. Table 4.4 ‘Dwelling Supply: How the balance can be met’ shows the number of dwellings proposed on brownfield/greenfield allocated sites, which equates to 252 on brownfield sites. It should be noted that the Worcester Porcelain site for 356 dwellings on brownfield land now has planning permission at June 2006, but is shown as still allocated in Table 4 as at 1.04.06.

The figures for allocated sites relate to those sites shown in Table 4.5 ‘Allocated sites (without planning permission) at June 2006’. This shows a total of 441 dwellings on allocated sites, (reduced to 422 if the brownfield sites are discounted by 10%), see Table 4.4 ‘Dwelling Supply: How the balance can be met’.
The Main Issues and Policies

<table>
<thead>
<tr>
<th>Table 4.5 Allocated sites (without planning permission) at June 2006</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Brownfield</strong></td>
</tr>
<tr>
<td>1. Diglis Road / Bath Road (remainder of site)</td>
</tr>
<tr>
<td>2. Worcester City Football Club</td>
</tr>
<tr>
<td>3. Cedar Avenue</td>
</tr>
<tr>
<td>4. A44 Service Station, Bromyard Road *</td>
</tr>
<tr>
<td>5. Barbourne Road/Brewery Walk</td>
</tr>
<tr>
<td><strong>Total Brownfield</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mixed Use sites</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>6. None</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Greenfield</strong></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>7. Former allotments, Bromyard Road *</td>
<td>19</td>
<td>0.68</td>
</tr>
<tr>
<td>8. Earl's Court Farm, Bromyard Road</td>
<td>187</td>
<td>5.33</td>
</tr>
<tr>
<td>9. Land south of Trotshill</td>
<td>45</td>
<td>1.3</td>
</tr>
<tr>
<td><strong>Total Greenfield</strong></td>
<td><strong>251</strong></td>
<td><strong>7.31</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>TOTAL ALL SITES</strong></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>441</strong></td>
<td></td>
<td><strong>10.59</strong></td>
</tr>
</tbody>
</table>

* Sites 4 & 7 are part of same site (planning permission granted June 2006)

4.17 A general review of the allocated sites has been undertaken. All the previous mixed use sites in the allocated local plan are excluded from the above. This is because the mixed use sites allocated in the adopted Local plan are either included in commitments or are now unlikely to deliver general housing. For instance, Diglis Basin has permission for housing, and The Butts development is under construction. The WRI Castle Street site has been purchased for an expansion of the University of Worcester and is likely to provide only student housing, which does not count towards the strategic housing target. The St George’s Roman Catholic Church, Sansome Street has permission for community uses which is being implemented instead of housing. The Worcester Porcelain site has permission for 356 houses and the former storage depot Bath Road for 91 houses and are therefore excluded from the allocated sites.

4.18 The additional 356 dwellings (from the Worcester Porcelain permission will increase the potential number of dwellings in the period 2006-2011 to 2572, which is 794 dwellings, or 26.2% above the Regional Spatial Strategy total housing target at 2011. However, only 56% of the target dwellings are built, or are under construction. A further 30.6% have planning permission. The housing market in Worcester is buoyant at the moment, and sites are coming forward, and houses being built at a much higher rate than in recent years. It is difficult to predict if this will continue till the end of the plan period. The strategic targets require houses to be complete by April 2011, not just with planning permission.
It also needs to be borne in mind that housing numbers are only part of the equation for future housing provision in the city. The government, in recent guidance to planning authorities, has stated that a relevant mix of house types, sizes and tenure needs to be provided to balance housing needs with supply. The need to promote certain types of dwellings, e.g. houses versus flats, and affordable units, has to be considered, as does the regeneration of brownfield sites in general. Not all housing sites will deliver the same product or have the same impact on the city and its environment, and more housing will require more infrastructure and other land uses for employment and community facilities.

The City Council therefore has considered these options:

- to confirm the above allocations, but introduce amended phasing of sites so that if completions continue at a high rate, then some of the sites can be held over beyond the end of the plan period, for future housing needs;
- confirm the allocations, considering that they meet other planning needs such as the regeneration of brownfield sites, and the provision of affordable housing, and keep back the greenfield sites to the end of the plan period;
- confirm the allocations, monitor progress, give priority to the brownfield sites, and consider that at a certain stage a moratorium may need to be placed on windfall sites (i.e. withhold planning permission for housing on sites that have not yet been identified) should housing numbers look like they significantly exceed targets in terms of completions.

As part of the consultation exercise on the production of this document, the issue of brownfield versus greenfield sites was debated. The majority of people favour using brownfield land before greenfield. The Regional Planning body states that brownfield sites must be promoted before greenfield ones in line with national and regional policies. However, PPG3\(^\text{(i)}\) (current government advice) does state that there is an exception to this principle where previously developed sites perform so poorly on a range of criteria compared to greenfield sites. These criteria include availability of brownfield sites, location and accessibility, infrastructure, the ability to build communities and physical/environmental constraints on the land. In the light of renewed government advice on creating mixed communities, a balanced judgement needs to be made, perhaps later on in the plan period, to assess if the ‘brownfield first’ policy is actually delivering the types of housing required, and delivering “communities”.

The source of housing sites should take account of the availability of brownfield sites changing from other land uses. There is general pressure to release employment sites in the city for housing. However, such a move would be short-sighted if it results in a further imbalance between the numbers living in the city and the availability of a wide range of jobs. The council needs to protect employment land from non-employment uses unless an up to date employment land review provides evidence for change. Consultants working on behalf of the City Council have completed a review of employment land in the city. Their report dated June 2007 confirms that there should be no change of policy.

\(\text{i\ This has now been superseded by PPS3}\)
The Main Issues and Policies

Land Supply

4.23 The policies in terms of land supply are outlined below:

H 1
Housing Land Supply- Strategic Context

The city council will ensure that sufficient land is made available throughout the period 2006-2011 to meet the balance of the regional strategy housing target. This will require at least an additional 1778 dwellings to be completed by 2011.

H 2
Allocated Housing Sites

The following sites, as shown on the proposals map, are allocated for housing development, subject to phasing in policy H4:

<table>
<thead>
<tr>
<th>Sites on previously developed land:</th>
<th>Hectares</th>
</tr>
</thead>
<tbody>
<tr>
<td>Worcester City Football Club</td>
<td>1.35</td>
</tr>
<tr>
<td>Cedar Avenue</td>
<td>1.21</td>
</tr>
<tr>
<td>A44 Service Station, Bromyard Road</td>
<td>0.15</td>
</tr>
<tr>
<td>Diglis Road/Bath Road (remainder)</td>
<td>0.30</td>
</tr>
<tr>
<td>Barbourne Road/Brewery Walk</td>
<td>0.27</td>
</tr>
</tbody>
</table>

Greenfield Sites:

<table>
<thead>
<tr>
<th>Sites</th>
<th>Hectares</th>
</tr>
</thead>
<tbody>
<tr>
<td>Former Allotments, Bromyard Road</td>
<td>0.69</td>
</tr>
<tr>
<td>Earl's Court Farm</td>
<td>5.33</td>
</tr>
<tr>
<td>Land south of Trotshill</td>
<td>1.30</td>
</tr>
</tbody>
</table>

Phasing

4.24 Phasing of the allocated sites is required

- to ensure that sites are developed in a sequential manner, with preference given to brownfield sites over greenfield sites, in line with the government’s sustainability principles,
The Main Issues and Policies

- to ensure a steady release of sites for housing throughout the plan period, to meet the Regional Spatial Strategy target,
- and to ensure that the Regional Spatial Strategy target is not significantly exceeded, by managing the release of housing land.

4.25 The government’s consultation document on planning for housing (PPS3, “Housing”, December 2005) suggests that in general, local authorities should not phase the land within the first 5 years land supply, except where local circumstances require it. It is considered that some phasing does need to be introduced in order to ensure that certain types of housing e.g family, and affordable housing can be delivered, and that the housing targets are not exceeded, which would undermine the regional strategy aim to regenerate the Major Urban Areas. At current rates of take up of housing land, some of the allocations in phase 2 may well not be required to meet targets, and will therefore be held over beyond the end of the plan period, to meet future housing targets. The preferred phasing is shown below. The Diglis Basin site, allocated in the existing local plan has planning permission, and so is not included below. However the bulk of the housing there will be delivered after 2006. This phasing will need to be constantly monitored and reviewed. The “lead in” time from planning permission to actual completions will also need to be taken into account.

H 3

Phasing of Allocated Housing Sites

Planning permission for housing development on allocated sites will be granted in the following phases:

**Phase 1: Prior to April 2008:**
- Diglis Road/ Bath Road (Remainder)
- Worcester City Football Club

**Phase 2: Post April 2008:**
- Barbourne Road/ Brewery Walk`
- Cedar Avenue
- A444 Service Station, Bromyard Road
- Former Allotments, Bromyard Road
- Land Earl’S Court Farm
- South Of Trotshill
The Main Issues and Policies

H 4

Housing Land Review

The city council will carry out an annual review of the housing land supply situation. The review will examine the take up of sites against the local plan housing targets and strategy. The outcome of any review may:

a. bring forward sites from phase 2 into phase 1 by way of supplementary planning guidance
b. postpone the release of sites into the next plan period (post 2011)

Windfall Housing Sites

4.26 Windfall housing sites are sites that come forward and that are suitable for housing, but that have not been identified in advance. At the last local plan inquiry, the City Council considered that windfall sites particularly on large (10+ dwellings) sites were coming forward at a high rate. The Inspector concluded that windfall sites would probably tail off as more sites are identified and allocated, and that the Council should make an allowance when calculating the amount of housing land required, by assuming that annually, some 65 dwellings would come forward on unidentified sites. The figure of 65 dwellings is made up of an allowance of 10 dwelling/annum on larger sites (sites over 10 dwellings), and 55 on smaller sites. However, in recent years, unidentified windfall sites have been coming forward at a much higher rate than allowed for. The annual Housing Land Monitor reviews the amount of such sites coming forward. The council will consider withholding planning permission on such sites in the future if, as a result of monitoring, it is likely that they will lead to a significant excess of dwellings over the Regional Spatial Strategy target, bearing in mind that in certain instances the redevelopment of windfall sites can meet other social and environmental objectives in the Local Plan, for instance, the provision of affordable housing, or significant environmental improvements. There is general public support for this monitoring approach.

4.27 There is evidence above to show that if all the dwellings with permissions on allocated sites and windfall allowances were met, the Regional Spatial Strategy target would be exceeded at 2011. However, as outlined in paragraph 4.18, there is uncertainty as to whether build rates will continue at present levels, and therefore careful monitoring of the situation is required. It is difficult to predict if brownfield windfall sites will continue at the present high rate. The City Council needs to ensure firstly that the housing land identified results in completed dwellings, as opposed to just planning permissions.
Windfall Housing Sites

Planning permission will normally be granted for housing development on non-identified (windfall) sites including changes of use, provided that,

a. the site is not allocated for other non-residential uses in the local development framework, or otherwise subject to policies that would mean that residential use was not appropriate

b. the proposed development meets the standard for development in saved policy BE1 in the City of Worcester Local Plan, and the requirements for affordable housing, if applicable

c. in the case of sites of 5 dwellings or more, the development would not lead to the RSS housing target being exceeded, taking into account:
   • completions since april 2006
   • dwellings under construction or with planning permission
   • outstanding allocated sites on previously developed land

4.28 The Housing Land Monitor 2005 shows that in 2004/05 64 sites were completed on large windfall sites, which is 54 above the windfall allowance. On small sites there were 34 completions, against the allowance of 55 dwellings. In all, windfall sites provided 33 more completed units than allowed for. In 2003/04, there were 27 more dwellings completed than allowed for (see Housing Land Monitor 2005, table 12). In 2005/06 124 dwellings were completed on large windfall sites and 60 on small windfall sites.

Creating Mixed Communities

4.29 One of the main elements of the government’s national housing and planning policies, and reinforced by policies within the Regional Spatial Strategy, is to create inclusive and mixed communities, in sustainable locations, near to services and jobs. The council will therefore wish to see a range of housing types in terms of size, tenure and affordability, particularly in larger housing schemes, to meet a range of household requirements. In order to best encourage a balanced housing market, the council first needs to have an up-to-date picture of the local housing market, and what the main housing requirements are in Worcester. The Council commissioned a “Housing Requirements Study” which reported in 2005 and which has looked at issues such as types and sizes of dwellings most required, and affordability issues, based on a range of evidence such as population and household projections, adequacy of existing housing, existing supply and housing costs.

4.30 The Regional Housing Strategy (June 2005) advocates the adoption of sub-regional housing market areas, as it is acknowledged that Local Authority boundaries do not necessarily coincide with real housing market areas. To this end, Worcester is defined within the South Housing Market Area for the region, along with other Worcestershire authorities (Malvern Hills, Wychavon, Bromsgrove, Redditch and
The Main Issues and Policies

Wyre Forest), and also Warwick and Stratford Upon Avon. A joint Housing Requirements Study has been commissioned for the South Market area, which reported in autumn of 2006. The report provides evidence for useful cooperation between Worcester and these other local authorities in terms of housing policy and provision.

Dwelling type/size

4.31 There is a marked contrast between different wards in the city on the types of properties occupied by households. Looking at 2001 Census data, whereas for the city as a whole, 24.3% of households lived in detached houses, this varied from over 14% in Warndon Parish South and St. Peter’s Parish wards, to less than 1% in Warndon and Gorse Hill. Semi detached properties ranged from just over 1% in Warndon Parish North, to over 13% in Claines (Source: Housing Requirements Study 2005, tables 43 & 44).

Tenure

4.32 The 2001 Census records 72.6% of the city’s households as being in owner occupied properties, 8.4% private rented, and 16.3% public sector rent (mainly with housing associations). The type of tenure does vary significantly throughout different wards in the city, for example, in Warndon Parish North, Warndon Parish South and St. Peter’s over 90% of households were in owner occupied accommodation, whereas in Gorse Hill the figure was 54%, and 56% in Rainbow Hill ward. In terms of those in housing association stock, 47% of households in Warndon ward were in this tenure, and 36% in Gorse Hill, compared to 0.9% and 1.4% in Warndon Parish South and North.

4.33 There is support from consultation for a wider mix of household size and type in Worcester. In particular there is a view that more family homes are required. Although there might be a perception that a large number of flats are being built in the city, this has to be seen in the context of the overall housing stock, new building providing less than 0.5% of housing stock each year. The 2001 Census shows that in Worcester only 15% of households lived in flats, compared to 36% in semi-detached properties, 24% in terraced housing and 24% in detached properties (Housing Requirements Study, Table 12). The main concern seems to be for affordability rather than any particular dwelling type. Flats may well be acceptable if they can be made affordable, and if they can allow people to obtain independent accommodation, whether through renting or purchase, for certain household types. However, the majority of people approaching the council for housing, and to whom a duty to re-house is owed, are families, and they have a preference for houses with gardens.

4.34 The Housing Requirements Study is not conclusive on the types of dwelling required in different parts of the city. It is clear however that a mixture of types, sizes, and tenures, will allow mixed communities to remain or develop. Policy H6 requires a range of house type in terms of size and affordability to be provided on appropriate development sites.
The Main Issues and Policies

Density

4.35 In order to make the most efficient use of land, national government policy and the Regional Spatial Strategy advocate more development on previously developed sites and higher densities for residential development. The majority of housing land committed or allocated within the city is on previously developed land (99.5% of planning permissions and 50% of allocated sites are on brownfield sites at April 2006).

4.36 The Structure Plan policy D9 puts forward densities of between 30 and 50 dwellings per hectare in or adjacent to urban areas, and suggests that densities of about 70 dwellings per hectare can be achieved in town and district centres.

4.37 Government guidance in Draft PPS3 puts forward a range of densities, applicable to specific types of locations, from city centres to rural areas (Draft PPS3 Annexe C). As Worcester is largely built up, the relevant locations and suggested densities are:

- City Centre – above 70 dwellings per hectare
- Urban (denser than suburban, mixed use areas) - 40-75 dwellings per hectare
- Suburban- 35-55 dwellings per hectare

4.38 This raises the lowest indicative density relevant to Worcester from 30 dwellings per hectare to 35.

4.39 In practice, the City Council has looked at the specific characteristics of a site and its general location, as well as the design requirements of any proposed scheme rather than starting off with specific density requirements. Draft PPS3 endorses this approach to some extent, listing a series of factors that will affect density such as, characteristics of an area, access to public transport, the need to promote good design, the need for housing, associated services and resource efficiency. Nevertheless local authorities will be expected to set “Indicative density ranges” expressed in net dwellings per hectare. Densities lower than those outlined in paragraph 4.37 above can be set but must be fully justified, and generally not lower than 30 dwellings per hectare. None of Worcester meets the proposed definition of “rural” within the guidance.

4.40 An analysis of large sites with permissions from April 2003 to April 2005 has shown that the average density range for city centre sites in Worcester is 183-313 dwellings per hectare, all of which are for flats. Half of these sites did not propose car parking. The range for urban sites (as defined in PPS3 Consultation paper) is 44-290 dwellings per hectare. The range for suburban locations in Worcester is 27-131 dwellings per hectare. An analysis of smaller sites shows a slightly higher range of densities. Thus, evidence from recent planning permissions suggests that generally, for city centre and urban locations, the PPS3 density ranges are appropriate. (N.B. The PPS3 definitions of City Centre, Urban etc are not precise and therefore open to interpretation.)
The Main Issues and Policies

4.41 Although generally all the sites would meet the density criteria in the proposed PPS3 guidelines, it should be noted that most of the sites that were analysed were not generally in existing low density locations, where lower densities might be more appropriate. Only six of the 20 sites were in lower density suburban locations and only two out of 20 examined sites were exclusively for housing as opposed to apartments. There is still likely to be resistance to densities of 30 dwellings to the hectare in more sensitive suburban locations where the character of the area and other issues such as open space and wildlife concerns are considered to be more important. The option is for the council to either designate some areas of the city for lower density development (say between 25-30 dwellings per hectare), or to adopt a criteria based policy that would allow exceptions to higher densities in certain circumstances. The latter policy would be easier to administer, and would allow more flexibility in terms of design solutions. In order to designate lower density areas, more detailed studies of existing housing densities and area characteristics would be appropriate. On larger housing sites the issue of density could be dealt with through development briefs.

Housing Types- Preferred policy options

4.42 In general the proposed densities outlined in policy H6 below have been supported though the consultation process. Government policy now also requires a design statement to be submitted with all planning applications, which should help produce appropriate designs, so that criterion is not now required as part of the policy and has been excluded.

H 6

Housing Types and Densities

Proposals for new housing developments will be required to:

a include a range of house types in terms of size and affordability:

b make efficient use of land by developing at a density of at least 35 dwellings per hectare, according to the density ranges for certain locations indicated below:

<table>
<thead>
<tr>
<th>Location type</th>
<th>Density</th>
</tr>
</thead>
<tbody>
<tr>
<td>City Centre</td>
<td>over 70 dwellings per hectare</td>
</tr>
<tr>
<td>Urban</td>
<td>over 40 dwellings per hectare</td>
</tr>
<tr>
<td>Suburban</td>
<td>over 35 dwellings per hectare</td>
</tr>
</tbody>
</table>

In addressing these requirements proposals should have regard to other policies and to the density and character of the surrounding area.
The Main Issues and Policies

Affordable Housing Needs

4.43 The government defines affordable housing as “Non-market housing, provided to those whose needs are not met by the market, for example homeless persons and key workers. It can include social-rented housing and intermediate housing”. Intermediate housing is defined as “Housing at prices or rents above those of social rent but below market prices or rent”. The government has also specifically excluded low cost market housing from the definition (Draft PPS3, Housing, Annex A) although it is included in the earlier Regional Planning Guidance.

4.44 The Regional Housing Strategy acknowledges that affordability is a big problem within the region. In the south of the region, including the Worcester area, it observes that “… out-migration of the “better off” from the conurbation has combined with migration from the South East of England to create a high demand, highly unaffordable, housing need market”.

4.45 In Worcester, based on the results of the Housing Requirements Study, a further 335 affordable dwellings a year (net) are required within the city to meet the housing needs of those households unable to rent or buy a home on the open market. This is considerably higher than the annual total amount of new housing built between 2000 and 2005 (although 414 dwellings were built in 2006) and a long way below the amount of affordable housing that is being provided annually through new build housing and conversions. The annual Housing Land Monitor 2006 shows that last year just 88 affordable homes were completed in Worcester. In addition to this there are 3000 people on the council’s waiting list and further numbers of people approaching the council every year as homeless.

4.46 The main source of land for affordable housing is the allocated housing sites and windfall housing sites. In the current Local Plan the allocated sites provide a range of affordable housing from 15% at Diglis Basin to 30% on other sites. The 15% at Diglis is now acknowledged as being very low, but was decided at a time when affordable housing policy was less advanced, and also took account of flood plain and contaminated land issues. On windfall sites, the current local plan seeks a contribution of 30% affordable housing on sites of 24 dwellings or more, or 0.8 ha and above. This is broadly in line with government guidance at the time.

4.47 New government guidance contained in draft PPS3 states that the Local development Framework should set out the overall affordable housing target within the plan period. The main sources of affordable housing are likely to be from existing committed affordable housing (i.e. with planning permission) that will need to be protected from other uses, affordable housing intended on allocated housing sites, and any affordable housing that may come forward on windfall sites. The total expected from these sources is shown below in Table 4.6 ‘Affordable Housing Target 2005-2011’. 
## The Main Issues and Policies

### Table 4.6 Affordable Housing Target 2005-2011

| Protect existing affordable housing commitments at 1/4/05 | 174 dwellings |
| Affordable housing on existing suitable allocated sites | 131 dwellings |
| Affordable housing on proposed Worcester Porcelain allocation | 106 dwellings |
| Affordable housing on suitable windfall sites | 42 |
| **Target 2005-2011** | **453** |
| **Annual average** | **75.5** |

4.48 The City Council will take every opportunity to provide for affordable housing on appropriate allocated housing sites and any windfall sites. The current policy is for windfall sites of 24 or more dwellings, or over 0.8 hectares in size to provide up to 30% affordable housing. This threshold is now considered to be low in the light of the high affordable housing needs demonstrated in the Housing Requirements Study and new draft government guidance, which considers that Local planning authorities should set a minimum site size threshold of 15 dwellings (Draft PPS3 paragraph 26).

4.49 There is considerable support from the public consultation to lower the threshold for affordable housing.

4.50 Table 4.6 ‘Affordable Housing Target 2005-2011’ shows an expectation of delivering up to 453 affordable housing units between 2006 and 2011, an average of approximately 76 units a year. This is based on an assumption in terms of windfall sites that of the 325 windfalls in the allowance, only one third will meet the threshold requirements, and these may deliver 40% affordable housing. This is also taking into account the fact that the buoyant housing market is producing more large windfall sites currently than allowed for in the Local Plan. In the past three years an annual average of 75 windfall units on large sites have been completed. The total affordable housing from windfall sites is very low in relation to the evidence of need for affordable units and should also be seen in the context of loss of affordable units, mainly due to the Right to Buy. In 2004/05, 61 affordable units were lost and in 2005/06, 69 were lost to Right to Buy.

4.51 At present no sites are allocated for 100% affordable housing within this plan period, although some respondents considered this should be done. The City Council is investigating the delivery of 100% affordable sites through its strategic housing role, as well as its role as a planning authority. The City Council will need to explore this option in partnership with other landowners. Suggestions have been made that other public land holders, e.g. the health authorities, and public utilities should provide surplus land for affordable housing. Indeed this is written into Regional Housing Strategy policy (policy 6.11, p.121). This could be a way forward and could benefit from a partnership approach. The Worcestershire Local Strategic Partnership has also begun to examine the delivery of affordable housing in more detail.
The Main Issues and Policies

4.52 Existing allocated sites are expected to provide between 15% and 30% affordable housing. However, when re-examining allocated sites in line with the draft PPS3 the council needs to consider the level of affordable housing to be sought, site viability, the impact on the delivery of housing provision, and the objective of creating mixed and sustainable communities. There was general support for increasing affordable housing on all sites, not just windfall sites.

4.53 Table 4.7 ‘Provision of Affordable Housing: Allocated Sites’ below estimates the amount of affordable housing that would be forthcoming from existing allocated housing sites under the existing policy.

Table 4.7 Provision of Affordable Housing: Allocated Sites

<table>
<thead>
<tr>
<th>Site no.</th>
<th>Site</th>
<th>Estimated capacity (dwellings)</th>
<th>% affordable dwellings</th>
<th>Estimated affordable units</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Diglis Road / Bath Road (Remainder)</td>
<td>30</td>
<td>25</td>
<td>7</td>
</tr>
<tr>
<td>2</td>
<td>Worcester City Football Club</td>
<td>80</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>3</td>
<td>Cedar Avenue</td>
<td>45</td>
<td>30</td>
<td>13</td>
</tr>
<tr>
<td>4</td>
<td>A44 Service Station, Bromyard Road &amp; Former Allotments, Bromyard Road</td>
<td>24</td>
<td>25</td>
<td>6</td>
</tr>
<tr>
<td>5</td>
<td>Barbourne Road / Brewery Walk</td>
<td>30</td>
<td>30</td>
<td>9</td>
</tr>
<tr>
<td>6</td>
<td>Earl’s Court Farm</td>
<td>187</td>
<td>30</td>
<td>56</td>
</tr>
<tr>
<td>7</td>
<td>Land South of Trotshill</td>
<td>45</td>
<td>30</td>
<td>13</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>Total</strong></td>
<td><strong>441</strong></td>
<td><strong>104</strong></td>
<td></td>
</tr>
</tbody>
</table>

4.54 An analysis of residential permissions granted in Worcester over the past 2 years show that only 6 sites have been over 0.5 hectares, and only 4 above 0.8 hectares. Although most sites above 0.5 hectares will meet the affordable housing requirements in terms of numbers of dwellings proposed, it seems reasonable to reduce the threshold from the current 0.8 hectares to 0.5 hectares in line with adjacent District proposals. This will also mean that any very low density developments approved will be required to provide an element of affordable housing, in line with government policy to provide mixed and balanced communities.

4.55 The issue of affordable housing delivery is of great concern to the City Council. The Council is aware that having sold off its housing stock, and with little suitable land holding of its own, the main mechanism in which it can provide affordable housing is through the development plan system on private housing developments. There has been considerable debate by councillors on setting a realistic and attainable affordable housing threshold.

4.56 The Preferred Option document put forward a policy for negotiating for affordable housing on windfall housing sites based on sites of 15 dwellings or more, with a view to seeking 50% of units as affordable. A discussion paper considered evidence in terms of size of sites coming forward in Worcester, and policies adopted or
promoted by other councils. Cabinet, Scrutiny Committee and Planning Committee have agreed a policy seeking contributions on sites of 12 dwellings or more, but to seek 40% affordable units. It is considered that these thresholds will bring more development into affordable housing, but with less of a deterrent to development. Thus policy H7 below is put forward:

H 7

**Windfall housing sites- provision of affordable housing**

Where residential development on windfall sites (including conversions of existing buildings) meets the following criteria the city council will seek an element of affordable housing based on 40% of the net site area, or in the case of conversions, 40% of the total number of dwellings

1. the residential site is at least 0.5 hectares in total size or is capable of accommodating 12 dwellings or more (including adjacent land if it can reasonably be expected to form part of a larger site);
2. the site benefits from reasonable access to local services and public transport.

4.57 In 'seeking' a proportion of affordable housing 'based on' 40% in policies H7 and H8, the council would be prepared to consider a reduced proportion should it be demonstrated that there are particular circumstances/constraints at a site that would make it impossible to reconcile the 40% proportion with an economically viable scheme.

4.58 The affordable housing shall be provided on site unless exceptional circumstances arise whereby more appropriate affordable provision can be made on alternative land. In each case any off site provision must be of a broadly equivalent value.

4.59 The delivery of affordable housing will meet identified needs within the city, but the stock of affordable dwellings needs to be maintained in the future to meet continuing need for reasonably priced housing. The city council therefore wishes to ensure that the affordable housing provided is of sufficient type, size and quality to meet these continuing needs and that the rental or other financial arrangements in the case of intermediate, or shared equity continue to fall within affordable levels. To this end, applicants for residential development will be expected to provide sufficient information about the affordable housing they propose, and how the housing is to remain affordable in the future (“in perpetuity”).

4.60 The issue of the “Right to Buy” is not directly dealt with through planning policies, as it relates to subsequent management of the affordable properties, even when planning conditions require retention of dwellings in perpetuity. The response to the consultation question on Right to Buy resulted in 67% of respondents supporting the Right to Buy. Other organisations such as the Campaign for the Preservation of Rural England, and the House Builders Federation did not support the Right to Buy. It is an area of Government policy that is being promoted at present, although
it is clearly impacting on Local Authorities abilities to meet affordable housing needs, especially as it can be shown in Worcester that the number of affordable units built in 2004/05 (62) was effectively cancelled out by losses from the affordable stock (61). In 2005/06 88 new affordable homes were provided and 69 sold through the Right to Buy, leaving a net gain of just 19 dwellings.

4.61 In most cases the provision of affordable housing is managed and controlled by registered social landlords such as housing associations. The City Council will encourage applicants of sites for housing to work with preferred partner housing associations. Where landlords wish to directly provide and manage the affordable housing, conditions will be placed on any permission to ensure that affordable housing is allocated to those in housing need in Worcester, and units are managed in accordance with Housing Corporation Standards where applicable. Applicants will therefore be asked to submit an “Affordable Housing Scheme” which will outline the number of units which are to be affordable; how they will be provided; which housing needs will be met; and ways that the units will be retained as affordable in the future. These safeguards are enshrined in policies H8 and H9 below.

4.62 It is acknowledged that some allocated sites have been allocated for sometime with the expectation of providing 30% affordable housing. Concern has been expressed that to increase the percentage of affordable housing may prevent these sites from coming forward by reducing incentives to develop. It is considered that a fair policy would be to increase the percentage of affordable housing sought on allocated sites for those sites where planning applications have not been submitted by the time the DPD is adopted. On the remaining allocated sites the Council would seek up to 40% provision in line with that proposed to be sought on windfall sites. The following policy is therefore included:-

**H 8**

**Allocated Housing Sites: Affordable Housing Provision**

On allocated sites where planning applications have not been submitted by the time of the adoption of this development plan document, the city council will seek an element of affordable housing based on 40% of the net site area.

4.63 Current guidance to providers of affordable housing is contained in Supplementary Planning Guidance, “Affordable Housing Provision through the Planning Process” (January 2005). The Council intends to update this advice through the provision of a Supplementary Planning Document on the same topic, in line with newer policies in the Balanced Housing Market DPD.
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H 9
Affordable Housing Schemes

Planning permission for residential development that includes an element of affordable housing will be granted subject to arrangements to ensure:

a. the provision of the particular amounts and types/tenures of affordable housing, and
b. that the benefit of affordable housing is secured and that it is maintained for the future.

H 10
Affordable Housing Schemes: Occupancy Conditions

Residential development which includes an element of affordable housing for rent or shared ownership and which does not involve development by a housing association or other social landlord will normally be granted planning permission. This will be subject to a condition limiting the occupancy of the housing to persons who the council consider are in need of low cost affordable housing.

Black and Minority Ethnic Housing Needs

4.64 The Housing Requirements Study looked at housing issues concerning the black and minority ethnic population of the city. Figures from the 2001 Census show that 94.2% of the population of Worcester is White British. This is a much higher percentage than the West Midlands region, at 86.2% and 87.5% for England and Wales. The largest non white ethnic group in Worcester (2001 census) is in the Asian and Asian British population, with the highest single group being of Pakistani origin (1.3% of total population).

4.65 Evidence from the Housing Requirements Study suggests that one of the main issues in terms of housing requirements is that the white and black/black British population has, on average smaller households. The Asian population have a higher average household size. Furthermore, the white population is typical of an ageing population, whereas the distribution of the BME population reflects younger growing populations. As the BME population ages, there may be a larger requirement for bigger homes to retain older family members within the household, unless the BME population emulates the trend amongst the white population for smaller separate households for the elderly, some of whom will require specialist housing.

4.66 In housing policy terms, the above factors suggest a need to ensure a range of sizes of dwellings across the city, and a possible need for larger family properties in those parts of the city with a higher BME population. The consultation exercise on Housing Issues attracted hardly any response from minorities in the city, but a
The Main Issues and Policies

higher response was achieved through the community workers on the Preferred Options document. More information is required on these issues. The wider consultation exercise through community workers has shown considerable support for providing larger 4-bed properties, as well as smaller properties.

Accessible Housing

4.67  The continuing rise in the number of the population who are elderly in the UK is well documented, and the situation in Worcester is no exception. In 2001 the census recorded a population over 60 years of 17,500 age of compared to 16,500 in 1991. Of these the highest proportional increase is in the numbers over 80 years old, rising from 2,700 in 1991 to 3,500 in 2001, and these trends are expected to continue. Increasing numbers of the population have limited mobility, including the disabled, and the elderly. The 2001 Census shows that 15.9% of the Worcester population had a “Limiting Long-Term Illness” (some 14,800 persons). This means that there are a considerable number of persons, or households that have a limited choice of housing because of likely problems with physical access to dwellings and mobility within them. Building Regulations for new housing now ensure that all new dwellings are accessible at ground floor level, and have WC facilities on the same level as the living room. This will help householders with limited mobility as well as their visitors. However in order to ensure a range of dwelling types in larger new developments the council will encourage developers to build a proportion of affordable and market homes to “Lifetime Home” Standards. These standards require adaptability and flexibility to be designed into the home. Lifetime homes are therefore suitable for older people, and for large numbers of disabled people, as well as non-disabled persons.

The Needs of Gypsies and Travellers

4.68  Provision of sites or homes for gypsies and travellers should by definition cover a wider area than a single Local Authority area. The Housing Act 2004 places a duty on local housing authorities to include the accommodation needs of gypsies and travellers residing in or resorting to their district when undertaking a review of housing needs. The Housing Requirements Study commissioned by the council in 2005 did not look at the specific needs of gypsies and travellers, but the council intends to address this issue when the study is updated and through a joint survey through the South Housing Market Area Partnership (which provides for joint working with all the Worcestershire districts, the County Council, Warwick and Stratford upon Avon districts).

4.69  The definition of gypsies and travellers: From ODPM “Revised Gypsy and Traveller Caravan Count Guidance Notes” July 2005:

4.70  Sites and encampments should be included in the return if the occupants are:

- traditional and Ethnic Gypsies and Travellers
- members of non-traditional New Traveller groups,

who live in caravans or other moveable dwellings.
The Main Issues and Policies

Note: Travelling showmen are excluded.

4.71 Traditionally gypsies and travellers have moved from area to area, where opportunities for work and cultural and social gatherings have arisen. Work opportunities have changed through recent times however, in farming, crafts and services, as have the needs and expectations and traditions of transient populations. Worcester City itself has not traditionally been an area of high demand for gypsy and traveller accommodation within the city boundary, although adjacent districts, particularly Wychavon, have. There is currently one official publicly funded gypsy/traveller site (a residential rather than a transit site) in Worcester, providing 20 pitches which can accommodate up to 40 caravans. Gypsy caravan counts show that in Worcester in July 2006 there were 37 caravans at the site. The site is owned and managed by Worcestershire County Council. This information does not take account of gypsies who live in traditional dwellings, who may wish to return to caravans.

4.72 The Regional Housing Strategy shows the distribution of gypsy caravans in each of the four sub-regional housing market areas in the West Midlands. The Central and South market areas have the highest numbers of gypsy caravans in the region (2004 figures). (West Midlands Regional Housing Strategy 2005, paragraph 4.182). The South has 32% of the Gypsy caravans but only 15% of the total population. When considering the need for accommodation, one indication is the number of unauthorised sites. In this respect the South Housing Market Area has the highest number of unauthorised sites (Regional Housing Strategy, table 4.4, p 105).

4.73 Information on numbers of Gypsies and Travellers residing in social housing in Worcester is not separately recorded by the council. The Regional Housing Strategy suggests that these numbers are low however. In Worcester an increased requirement for caravans from this source in the future is not anticipated, as the recent Housing Requirements Study did not identify large numbers of this type of household seeking to return to caravans.

4.74 The issue of whether Gypsies and Travellers will require more access to social housing is largely an issue of housing management, as housing supply through planning does not specifically allocate units to particular occupants, except in exceptional cases when the dwellings are purpose built for particular client needs. However, one impact that does reflect on planning issues already mentioned are the size of dwellings, as on average Gypsy and Traveller families are larger than those of the general population. Many new built dwellings in Worcester are small, (one and two bed) and a policy that allows for larger dwellings in some developments will therefore benefit other larger families within the city and those that traditionally prefer to live in extended families.

4.75 No detailed estimates of the assessment of Gypsy and Traveller accommodation needs have been carried out in Worcestershire or the South Housing Market Area. The Regional Housing Strategy attempts a rough estimate based on a commissioned survey of unauthorised pitches and an estimate of growth from existing families. This suggests that there could be a need for between 205 and 275 pitches in the
South Housing Market Area to 2010, mainly for long-stay residential use as opposed to transit sites. This will include dealing with a perceived current backlog of need, and therefore a similar increase in pitches is not anticipated post 2010.

4.76 To date the consultation on Housing Issues has had no specific feedback from gypsies and travellers. It would be appropriate for Worcester to work with the other Local Authorities within the South Market Housing Area sub-region and with the Housing Corporation to jointly establish the need for pitches for caravans/mobile homes in the wider area.

4.77 In the absence yet of the detailed evidence of need for more gypsy and traveller pitches within Worcester, it is not appropriate to allocate sites for such accommodation at this stage. It is suggested therefore that an “enabling” policy be drawn up, which will list criteria which will need to be met if a need for such sites is established. A South Housing Market Area study will be commissioned in the autumn of 2006 to survey the need for gypsy and traveller accommodation in Worcester and the surrounding area. The enabling policy is shown below as policy H11.

H 11

Gypsy and Traveller Sites

Planning permission for sites for gypsies and travellers will only be permitted where a demonstrable need can be shown and where the following criteria can be met:

a. sites should not be within the designated flood plains of the river severn and the brooks as defined on the proposals map
b. sites should not be within the Green Network unless they are capable of development without detracting from the character of Green Network or adversely affecting any wildlife corridor.

c. sites must be acceptable in terms of their access and impact on highway safety

Key Workers

4.78 The affordability and availability of housing, whether for rent or sale, has an impact on employment opportunities in the city. Some employment vacancies are difficult to fill as potential employees cannot afford to stay/move to the city because of local housing costs. In some parts of the country, particular housing provision or financial assistance is given to “key workers” in order to support the local economy. The City Council is not involved in any such schemes at present.

4.79 There are several issues involved. The first is to define key workers. The second is to establish the type of housing provision they require. Another is to decide what priority key workers should be given over others in housing need, and finally who should provide the accommodation/grants?
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4.80 The PPS3 (Housing) Consultation paper defines key workers as, “...those groups eligible for the Housing Corporation funded Key Worker Living programme and other employed in the public sector identified by the Regional Housing Board for assistance.” It is clear that such schemes will require additional funding or funding diverted from existing schemes for affordable housing. The Housing Requirements Study 2005 examined the levels of economically active in Worcester and average incomes but came to no conclusions concerning the need for key worker housing.

4.81 Although there is general support for the idea of providing for key workers, there is little agreement over who should be so defined. There is also very little support to give key workers priority over others in housing need. More evidence is required to decide those workers who most require help with housing and who are most important to the local economy. It is unlikely that the city council alone has the resources to subsidise key workers without detracting from other identified housing needs. Thus it is suggested that the way forward is for the council to work with the Registered Social Landlords, business community and public bodies to establish more precise key worker needs, and incorporate this in the overall assessment for affordable housing.

Student Housing

4.82 The University of Worcester is proposing to expand its student numbers by up to 4000 and as part of the expansion has purchased the former WRI Castle Street site in Worcester city centre. The City Council has established close links with the University over future housing needs of students and numbers involved. There is widespread public support for more purpose built student accommodation rather than general dispersal throughout the city. Much of the increased numbers will be in part-time students who are already housed in and around the city or who may work from home. The University intends to significantly expand its student accommodation, (effectively doubling its existing provision), while growing by one-third in terms of overall numbers. Purpose built accommodation is planned at the new campus in Castle Street and on the existing one at Henwick Grove. This intention is welcome, although it may not solve all increased demand from student numbers.
5 Sustainability Appraisal

5.1 It is necessary to ensure that the policies put forward in this document are sustainable, thus a sustainability appraisal has been drawn up. A Sustainability Appraisal is a process that identifies and reports on the likely significant effects of the policies, and the extent to which they will achieve social, economic and environmental objectives.

5.2 The policies in this Development Plan Document need to be sustainable in the context of Worcester’s needs, but also in the context of higher level regional and national government objectives.

5.3 The Sustainability Appraisal assesses the impact of the submitted options against sustainability indicators, including the amendments to certain policies and the additional policy on climate change. The Sustainability Appraisal is published as a separate document to accompany this Balanced Housing Market document.

Picture 5.1 Impact of flooding in residential area - July 2007

Picture 5.2 Warmstry Court - July 2007
Sustainability Appraisal
Monitoring and Implementation

6 Monitoring and Implementation

6.1 The progress on meeting the aims and policies within this document will be monitored on a regular basis, through the Annual Monitoring Report that covers the whole Local Development Framework.

6.2 In terms of housing, the following indicators will be monitored:-

6.3 Annually:-

- completions by number of dwellings, bed size, house type and tenure,
- planning permissions, number of dwellings by bed size, house type and tenure,
- windfall sites by number of units and site size,
- amount of affordable housing permitted annually,
- housing trajectory, showing completions against RSS targets,
- completions on greenfield/brownfield sites,
- permissions on greenfield/brownfield sites,
- changes in housing needs through up date of the Housing Requirements study,
- number of refusals on housing policies,
- the number of gypsy and traveller pitches and sites that have been the subject of planning permissions,
- densities of housing developments in relation to the location types in policy H6(b).

6.4 Not all implementation will be through planning policies. The Strategic Housing Service of the City Council will also promote policies to increase the supply, quality and variety of housing in the city. Progress on this will be reported through committee reports and updates to the Housing Strategy as required. For some forms of housing implementation will be through bodies other than the city council. These include housing associations, the University of Worcester, private developers and social services. The city council will work closely with these organisations to ensure that housing provision meets the aims outlined in chapter 3 of this document.
Monitoring and Implementation
Inspectors Report

1.1 I have been appointed by the Secretary of State for Communities and Local Government to carry out an independent examination of Worcester City Council’s Balanced Housing Market Development Plan Document (DPD), submitted to her on 23 October 2006. A pre-examination meeting was held on 18 April 2007. The examination has been conducted by way of written representations and by way of hearings held on 3, 4 & 5 July 2007. I have had regard to all the representations which were made on the DPD in the 6 week period following its submission to the Secretary of State.

1.2 My report considers the soundness of the submitted document, having regard to the tests of soundness set out in PPS12 and to the guidance in the Planning Inspectorate’s ‘Guide to the Process of Assessing the Soundness of Development Plan Documents’.

1.3 It is unfortunate that this DPD, with its set of new and updated housing policies, was submitted just before the new Government planning policy statement on housing (PPS3) was issued in November 2006. The final version of PPS3 could not therefore have been taken into account in the preparation of the DPD, although the earlier consultation version of December 2005 was available prior to the Council’s Preferred Options Report. While appreciating the stopgap nature and limited period of the DPD, I have nevertheless considered its consistency with current national planning policy in PPS3 as this is one of the tests of soundness to be applied in my Examination.
1.4 That said, my approach to the Examination has also been pragmatic not least because, as I explain below and under General Considerations, this DPD was prepared in the context of a highly unusual situation. Even though the City of Worcester Local Plan 1996-2011 was adopted only 3 years ago, housing policies need to be reviewed. But the Joint Core Strategy for South Worcestershire is not due for adoption until 2010, involving as it does the City Council and neighbouring authorities. So although PPS3 needs to be taken into account I also pay particular regard to the guidance in PPS3(6) concerning the desirability of maintaining plan-making programmes. It is important that the move to the Local Development Framework does not lead to any gap in coverage of development plan policies.

1.5 In response to the objections at submission stage the Council proposed a limited number of changes to the DPD, and these have been drawn together in core document BHM30. As that core document was presented to me at the end of the Examination hearings I take it to be the definitive source of the Council’s Proposed Changes. I consider those Proposed Changes in my Examination. However, they have not been advertised and I treat them with due circumspection. My ability to make changes to the DPD at this late stage is of course constrained by the need to be satisfied that they are not so significant as to warrant public consultation or a fresh sustainability appraisal.

1.6 After the following summary of findings I set out the reasons for my conclusions, focusing on the 12 matters I identified for the Examination. The order in which I deal with these matters is generally based on the order of the DPD itself.

2. SUMMARY OF FINDINGS

2.1 I find that parts of the DPD are unsound, but that the DPD as a whole is capable of being made sound by some modest amendments and by deleting certain policies. The changes necessary are set out in the last section of my report, and I believe they are within the constraints just referred to.

2.2 The housing land supply policies are generally endorsed subject to the deletion of one part of policy H4 concerning the possible allocation of further housing sites. The provision for affordable housing and types/densities of housing is sound subject to limited amendments affecting policies H6 and H7A, a re-writing of policy H8, and a small addition to the reasoned justification for policies H7 and H7A. Policies H6A (sustainable homes), H10 (lifetime homes) and H12 (student accommodation) are recommended for deletion having been found to be unsound. Amendments along the lines of the Council’s Proposed Changes are recommended for paragraphs 1.2 and 6.3, and a couple of indicators are proposed for addition to paragraph 6.2.

2.3 There are shortcomings in terms of PPS3, sustainability appraisal, and implementation. I conclude that in the particular circumstances of this DPD they are not such as to render the DPD unsound, although they are matters that will require greater attention in the preparation of the DPDs that follow.

3. MATTER 1: GENERAL CONSIDERATIONS

Policy aims
Inspectors Report

3.1 In response to an objection the Council proposes to add the following aim to the list of housing aims in paragraph 3.1 of the DPD: “To meet the need and demand for housing in Worcester”. Desirable though this is as a general aim, it is arguable that meeting demand is potentially inconsistent with the first aim and with policy CF2 of RPG11. In any event, given the wide scope of the existing aims I do not consider that the proposed addition is necessary for the soundness of the DPD.

Plan period and relationship with Joint Core Strategy

3.2 The DPD does not follow national policy in PPS3(53-55), which indicates that housing provision should be made well beyond the period to 2011. However, this does not in itself mean a failure to meet soundness test 4(b), as a key question relating to that test suggests that there could be a local justification. In this case I accept that there is a local justification, which is that a Joint Core Strategy is being prepared, including areas outside Worcester City, and that this would be pre-empted by any longer term provision in the DPD before me. The latter has the more limited role of updating aspects of the existing Local Plan and I can see the benefit of this in principle as the current Local Development Scheme indicates that it will be several years before the adoption of the Joint Core Strategy and subsequent local development documents.

3.3 PPS12(2.9) states that the core strategy should normally be the first DPD to be produced. However, it does allow for an exception where the local planning authority has up to date saved policies and where the Local Development Scheme gives priority to another DPD. In this case the Local Development Scheme does give priority to the Balanced Housing Market DPD, with adoption scheduled for January 2008.

3.4 A principal aim of PPS3 is to underpin the necessary improvement in housing delivery through a new more responsive approach to land supply at the local level. Against this background I consider that it is justifiable, in principle, to bring forward the Balanced Housing Market DPD in advance of the Joint Core Strategy. Apart from updating the housing land supply position the Council has highlighted the need to produce new policies relating to affordable housing, sustainable homes and the University of Worcester. I consider these policy areas below, but in general terms I do not find the DPD to be unsound simply on the basis of the DPD period or its production in advance of the Joint Core Strategy.

Relationship to Local Plan and Core Strategy

3.5 The Council’s Proposed Change to paragraph 1.2 of the DPD would add text to explain the relationship with the adopted Local Plan and the proposed Core Strategy. This adds a context to the DPD, and I support it subject to minor amendments to make it more concise and to take account of my recommendation on policy H6A (sustainable homes). [See 10.1 below]

The programmes of infrastructure providers

3.6 The Council confirms that infrastructure providers have been consulted. Although the DPD does not describe how the DPD relates to their programmes I have no reason to doubt that they have been taken into account. In this respect I do not consider the DPD to be unsound in terms of soundness test 4(a).
Monitoring and implementation

3.7 PPS12 states that review and monitoring are crucial to the successful delivery of the spatial vision and objectives of the Local Development Framework, and that the strategy and policies should be expressed in terms which emphasise the means and timescale by which objectives should be met. With regard to housing, PPS3 states that local development documents should set out an implementation strategy that describes the approach to managing the delivery of the targets and trajectories. This should include clear trigger points for management action. These requirements are generally covered by soundness test 8.

3.8 In applying this test, I find that the DPD is lacking in both clarity and substance. In view of the subject matter of the DPD the monitoring and implementation section is very thin, amounting (in paragraph 6.2) to little more than a list of indicators to be monitored annually. However, there are references elsewhere in the DPD to implementation and monitoring. For example reference to the housing trajectory and the Annual Monitoring Report is made at the end of paragraph 4.7. Having regard to the new guidance in PPS3, and especially paragraph 62, the Council’s future DPDs should contain a more coherent implementation strategy.

3.9 It appears from the wording of the policies that the responsibility for implementation will be with the City Council or with those proposing development. However, paragraph 6.3 states that not all implementation will be through planning policies. This begs the questions of what other policies are likely to have a bearing on the supply, quality and variety of housing sought in the DPD, and how will they be taken into account in implementing the DPD? In its Proposed Change to this paragraph the Council lists some of the other bodies involved, but it remains not entirely clear which policies and proposals they will be contributing to and how this will be coordinated. Although the Change does not greatly strengthen the text in relation to the guidance in PPS12(1.8) it is worthwhile and I recommend it, subject to slight amendment. [See section 10 below]

3.10 Some policies in the DPD are lacking in terms of targets and timescales: for example, policies H10, H11 and H12. Provision for monitoring is also lacking for some policies: in particular, policies H6A, H6(b), H10, H11 and H12. I recommend the deletion of policy H6A under matter 8 below. Policies H10 and H12 are expressed in terms of ‘encouraging’ development. It is not clear what form the encouragement would take, or that it would make any real difference. In the absence of any explicit evidence base, targets, timescales and clear provision for monitoring and means of implementation, I can see no planning purpose in including these two policies.

3.11 While concluding that the provision for monitoring and implementation is deficient in some respects, I consider that this can be addressed by deleting policies H10 and H12 and by adding indicators to paragraph 6.2 to provide for the monitoring of policies H6(b) and H11. With these amendments I conclude that the DPD would generally satisfy the requirements of soundness test 8.

4. MATTERS 2, 3, 4, 5 & 6: HOUSING LAND SUPPLY

4.1 The housing land supply issues relate to DPD policies H1, H2, H3, H4 & H5, and mainly to soundness tests 4, 7 and 9.
Inspectors Report

4.2 In accordance with Government guidance the overall provision in the DPD was correctly based on the application of the City’s Structure Plan proportion to the county figures relating to 2001 – 2011 taken from Table 1 of RPG11 (2004). For the purpose of making provision in the development plan, RPG11 policy CF3(A) indicates that the resulting figure should be applied as a maximum.

4.3 RPG11 relates to former Government guidance in PPG3. Although the submission DPD was able to take account of the then emerging new guidance in draft PPS3 (December 2005) it does not fully reflect the final version. As a result I find that it is already out of date in some respects. It now falls short in ways that are of importance in terms of the Government’s commitment to improve the supply of housing following the Barker Review of Housing Supply.

4.4 First, the DPD does not provide for 15 years delivery of housing as required by PPS3(53). I have already referred to the local justification for providing for a shorter period.

4.5 Secondly, the DPD does not specifically identify sufficient deliverable sites to satisfy requirements for 5 years, in accordance with PPS3(54). However, apart from the allocated sites there are considerable numbers of homes under construction and with outstanding planning permissions. Government guidance (PPS3: 58) now states that outstanding planning permissions should not be included in determining how much land is required unless there is evidence that the sites are developable. I am aware that those permissions include land that was allocated in the adopted Local Plan. Paragraph 4.18 of the DPD reports that houses are being built at a much higher rate than in recent years and it is not evident to me that there is likely to be a significant problem in respect of whether the sites with permission are developable over the limited Plan period. I give further consideration to this matter under test 7 below.

4.6 Thirdly, the inclusion of a windfalls allowance in the housing land supply is also rather at odds with the new Government guidance in PPS3(59). But the allowance is a relatively small component of total supply and less than half of the projected surplus. The size of the allowance is based on that in the adopted Local Plan and it is evidently conservative in comparison with figures over the last three years. The guidance in PPS3(59) does allow some scope for taking account of windfalls where there are genuine local circumstances that prevent specific sites being identified. In this case I can understand the difficulties of allocating further land for housing development in such a tightly constrained urban area.

4.7 Fourthly, PPS3(33) indicates that in determining the local level of housing provision account should be taken of the Government’s latest published household projections. In this case the 2003-based projections, published in March 2006, have not been taken into account. The new information was probably too recent to have affected the Council’s Preferred Options Report, which was issued at about the same time. It appears from the spatial options being developed at regional level (CCD11) that the projections indicate a substantially higher level of demand for the period 2001-2026. They are taken into account in one of the spatial options for the region. PPS3(53) makes it clear that this emerging Regional Spatial Strategy should be taken into account, although the weight I
attach to this factor reflects the fact that the options represent an early stage in the revision of the Regional Spatial Strategy. Any increased regional provision will of course need to be considered strategically in preparing the Joint Core Strategy.

4.8 Fifthly, although not relating to PPS3, there is a conflict with PPS12 in policy H4; but this is limited and can be dealt with by an amendment that I describe in addressing that policy more fully under soundness test 9 below.

4.9 I conclude that the housing land supply provisions in the DPD do not strictly accord with current Government policy in all respects. However, I accept that this was unavoidable, given the timing of PPS3. With this in mind, and for the reasons given above, I conclude that in practice the inconsistencies are not so serious as to render this part of the DPD unsound in terms of soundness test 4(b).

Test 7

4.10 It is likely that other factors will add to the pressure to increase housing provision at Worcester in future. I have in mind the designation in RPG11 of Worcester as a sub-regional focal point for development, and the more recent successful bid for ‘New Growth Point’ status for the city. The implication of the former is that Worcester is capable of balanced and sustainable growth, accommodating strategic housing development. While it is stated that Worcester would act as a sub-regional service centre, policy CF2(B) of RPG11 indicates that the functions of each of the sub-regional foci will need to be determined through further study. Becoming a New Growth Point will help to achieve the City’s growth plans by enabling it to share in a fund for infrastructure projects and essential studies to support sustainable growth. Growth ambitions include substantial housing development, although the period concerned extends beyond that of the DPD.

4.11 There will be an opportunity to address the implications of such factors, as they become clearer, in the Joint Core Strategy. The DPD before me has a limited time horizon and I am conscious that it does provide for 794 dwellings in excess of the stated requirement. There is no delivery assessment of the major sites relied upon, and yet I also have little evidence of serious problems in this respect. At the hearings the Council pointed out that a substantial amount of the as yet undeveloped non-allocated housing land comprises large sites where developers have made commitments, in terms of construction starts or Section 106 agreements. This is encouraging and provides some support for the Council’s expectation that the required dwellings will be completed within the Plan period.

4.12 There is concern in some quarters about the possibility of a shortfall in housing land supply immediately after the end of the Plan period in 2011, as the anticipated Allocations DPD is not due to be independently examined until the end of 2010, and there will need to be some allowance for lead-in time for the development of new allocated sites after its adoption. I do not see that this would necessarily be a significant problem as preparation work on some proposals could be possible before adoption and there could be scope for granting some permissions earlier depending on the content of the Joint Core Strategy.
4.13 In any event I could not reasonably recommend that additional sites be allocated in the DPD before me since in my view this would have to be subject to re-running the processes of public participation and sustainability appraisal. This would push back the adoption date of the DPD, reduce the Plan period to a point that would make it of more questionable value, and be a distraction from the task of progressing the rest of the Local Development Framework, including the Joint Core Strategy and the following Allocations DPD.

4.14 The Council points out that the alternative allocation sites suggested by objectors are all employment sites, which, even if not currently active, need to be protected as such as they are in sustainable locations and will be necessary for balanced growth. It draws support from the City of Worcester Employment Land Study (CCD30), although that document only became available immediately before the Examination hearings. The Council accepts that the Study did not include financial appraisals of each site; but then such land use decisions also require a longer term view and I can see that questions of economic viability can be affected by various circumstances at the time.

4.15 It is not evident to me that the alternative sites have been the subject of full sustainability appraisal. The appraisal for Ronkswood Hospital was received only shortly before the Examination hearings and does not contain full and robust supporting evidence together with a context that allows me to compare it with the other options and in the light of adequate public consultation. Therefore I am not satisfied that any of the alternative sites are better qualified in terms of sustainability criteria and guidance in PPS3(38-39). In this respect the Council accepted at the hearings that its Sustainability Appraisal did not go as far as envisaged in the last sentence of PPS3(39). I have reservations about the effectiveness of the Sustainability Appraisal, particularly in respect of housing land supply policies. It has all the appearance of an added output, rather than a tool or input in the decision-making process, and it is difficult to see how its level of generality allows any useful conclusions to be drawn on the sustainability of the housing allocations in policy H2. But in practical terms little can be done now to achieve a more satisfactory outcome. The DPD does not allocate any sites that are not already allocated in the adopted Local Plan, which runs for the same period. As I have indicated, I would not feel justified in replacing existing allocations or adding new allocations, notwithstanding the fact that a few of the allocations are of greenfield sites.

4.16 In conclusion I find some shortcomings in the evidence base supporting policies H1 and H2 and an unconvincing consideration of alternatives. However, given the stopgap nature of the DPD and the background of the adopted Local Plan I conclude that the provision for housing land supply is adequate, credibly-based and the most appropriate in all the circumstances, and that the policies and proposals are acceptable in terms of soundness test 7.

Test 9

4.17 I consider soundness test 9 in the context of the national housing policy objective of maintaining a flexible and responsive supply of housing land, managed in a way that makes effective and efficient use of land, and including re-use of previously developed land where appropriate. It seems to me that the flexibility in the DPD takes the form of first, the excess of supply over requirement, as detailed in Figure 4; and secondly, policies
H3 and H4, which are intended to ensure that the required provision is met by a steady release of sites over the Plan period, and that sites are developed in a sequence that gives preference to previously developed land.

4.18 Given the short period of the DPD the phasing of allocated sites is of little practical benefit. In the event that the next annual review finds supply to be inadequate, policy H4(a) could be invoked to bring forward sites from phase 2 into phase 1. By the time that the review had been completed and the supplementary planning document adopted, the April 2008 threshold would probably be imminent or passed. However, policies H3 and H4(a) do at least allow some priority to be given to the brownfieldsites and I do not find it to be unsound.

4.19 Looking to the later annual reviews the Council appears to rely on policy H4(c), which provides for a review that could lead to the allocation of further sites, apparently through the production of a supplementary planning document. This approach is flawed and contrary to PPS12(2.15&2.43), which signals unequivocally that allocations of land should be made through development plan documents and not through supplementary planning documents. Given that the review would take place part way through the Plan period, and possibly at about the time of the revision of the Regional Spatial Strategy, it would not in my view be practicable to complete the review, and the production, adoption and implementation of an impromptu new allocations DPD within the remaining Plan period. The chances are that the need for this DPD would be overtaken by the work on the Joint Core Strategy and following DPDs – a point that was accepted by the Council at the Examination hearings. This part of the DPD is clearly unsound in terms of soundness test 4(b) but could be made sound by deleting part (c) of policy H4 and paragraph 4.26.

4.20 There is some concern about the constraining effect of criterion (c) of policy H5, which would effectively prevent the permission of further windfall developments of 5 dwellings or more if they would result in the RPG11-derived target being exceeded. While it is likely that the revision of RPG11 will lead to increased provision at Worcester, it will be some time before the implications are clear and I consider that it is appropriate for this matter to be addressed in the Joint Core Strategy. The Council is understandably concerned that future growth options should not be prejudiced by decisions taken now in the narrower context of its own area. In view of my earlier conclusions about the adequacy of the housing land supply I accept that it is reasonable in this case for criterion (c) to be expressed in terms of projected rather than completed housing development. In conjunction with policy H4(b) this policy also effectively serves to give priority to brownfield sites, and in the circumstances of Worcester I do not find that it needs to do more in this respect to bring it in to line with PPS3.

4.21 Allowing for the limited deletions referred to, I conclude that the housing land supply policies do have the reasonable flexibility required by soundness test 9.

5. MATTER 7: HOUSING TYPES AND DENSITIES.

5.1 In applying criteria (a) and (b) of policy H6 there is a need to take account of the character and density of the surrounding area. This appears to be recognised by the inclusion of criterion (c). However, I can see from the representations that treating (c) as a separate and independent criterion creates potential conflict within the policy and interpretational problems. I consider that a small structural amendment is required to
enable the policy to clearly and properly fulfil its purpose. This involves deleting criterion (c) and replacing it with the following separate sentence to follow the two other criteria: ‘In addressing these requirements proposals should have regard to other policies and to the density and character of the surrounding area’. This would add flexibility and enable soundness tests 7 and 9 to be met.

5.2 I see no need for the Council’s Proposed Change, which involves adding both ‘where practicable’ and ‘where appropriate’ to criterion (a). That would amount to excessive qualification and reduce the clarity of the policy. The Council’s Proposed Change would also delete reference to saved Local Plan policy BE1 and introduce a number of other criteria. While other development plan policies do need to be taken into account, this would be generally covered by my recommended amendment. I accept that there is no need to make specific reference in the policy to saved Local Plan policy BE1. As to the new criteria in the Council’s Proposed Change, such a substantive and detailed addition would in my view need to be subject to public consultation and at this stage I do not feel able to recommend it. Moreover, given my recommended amendment and the range of other development plan policies I conclude that it is unnecessary.

5.3 Subject to my proposed amendment I conclude that policy H6 is sound.

6. MATTER 8: SUSTAINABLE HOMES

6.1 I can well understand the aims of the Council in including the new policy H6A on sustainable homes, for it is supportive of national efforts to promote energy efficient buildings. It also relates to policy EN2 of RPG11, which indicates that development plans should include measures to minimise energy demands from development.

6.2 However, by setting a thermal performance standard that is based on a quantitative improvement on the requirements of the Building Regulations, policy H6A conflicts with current Government policy in PPS1(30). The latter makes it clear that planning policies should not cut across other legislative requirements such as those set out in Building Regulations for energy efficiency. In describing the spatial planning approach PPS12(1.8) makes a similar point.

6.3 In support of its case the Council refers to new emerging guidance on Planning and Climate Change contained in the draft supplement to PPS1. The weight attached to this document is of course limited by the fact that it is still at consultation stage. While it is clearly concerned with encouraging the delivery of sustainable buildings and getting planning authorities to be concerned with the environmental performance of new development, I find no specific support for a policy worded in the fashion of policy H6A. Indeed, the draft supplement (paragraph 31) clearly qualifies this encouragement by stating that planning authorities should not need to devise their own standards for the environmental performance of individual buildings as these are set out nationally through the Building Regulations. While local development or site specific opportunities might lead an authority to consider and justify a local approach, I infer from the first bullet point of paragraph 32 of the draft supplement that the blanket application of the kind of building performance measure specified in policy H6A should be avoided.
6.4 In bringing forward the draft supplement, together with the Code for Sustainable Homes and the intention to further strengthen the Building Regulations, the Government is concerned about the need to provide clarity in the policy framework for achieving zero carbon development. This requires distinct roles for planning policies, the Building Regulations, and the Code; and to achieve this clarity the Government seeks to minimise overlap and the dangers of duplicative and conflicting regulation.

6.5 I conclude that policy H6A would undermine this aim. By conflicting with Government policy, both established and emerging, and without sufficient local justification, it does not pass soundnesstest 4(b).

6.6 I have a few other reservations about policy H6A. Together with its reasoned justification in paragraphs 4.36 and 4.37 it is rather confusingly inserted in the middle of what I take to be the reasoned justification for policy H6. It is questionable how the policy contributes to the 'Balanced Housing Market' sought by the DPD and, for example, it does not appear to relate directly to any of the policy aims in paragraph 3.1. It therefore leads me to doubt the coherence of this part of the DPD and its soundness in terms of test 6. The Council’s statement provides further information on how the policy would be implemented and monitored but these aspects are not clear from the DPD itself. There is a need for qualitative monitoring, as indicated in PPS3(19). But the policy is not covered by the monitoring provision set out in section 6 of the DPD. On this basis I conclude that there is also a failure to meet soundness test 8. This and the other points I make in this paragraph could be acceptably attended to by some amendments to the text, but in view of my conclusions in the preceding paragraphs the policy would remain unsound and, together with its reasoned justification, should be deleted.

7. MATTERS 9, 10 & 11: AFFORDABLE HOUSING

The evidence base

7.1 Although the robustness of the evidence in the two paragraphs preceding policy H7 has been subject to some criticism I am conscious that the reasoned justification for the affordable housing policies H7, H7A, H8 and H9 is more extensive, running from paragraph 4.45 to 4.64. Early on in this text there is reference to the Council’s Housing Requirements Study. The Final Report of this study, dated December 2005, is substantial. It has also been referred to in a Council discussion paper on the delivery of affordable housing, which is mentioned in paragraph 4.58 of the DPD and does appear to have been influential in determining the threshold and percentage figures in policies H7 and H7A. The local planning process is also informed by the Council’s annual Housing Land Monitor, which measures progress in the provision of affordable housing as part of a continuing assessment of the availability of housing land.

7.2 PPS3(29) gives some quite specific guidance on the formulation of affordable housing policies, but as it was issued just after the submission of the DPD it could not have been taken into account at the time the policies were formulated. It states that local planning authorities will need to undertake an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed, including their likely impact on overall levels of housing delivery and creating mixed communities. Although I find no specific viability assessment report in the supporting documentation this does not itself lead me to conclude that the DPD or its affordable housing policies are unsound.
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The Council was informed by the evidence I have referred to and has given a good deal of consideration to the contents of the policies in the light of its own record and experience of securing affordable housing on brownfield sites where economic viability has been a consideration. I also infer from paragraph 4.58 of the DPD that the deterrent effect on development was taken into account in settling on the proportion of 40% and on the site size threshold in policy H7. The threshold is a little below the national indicative minimum, but PPS3(29) does allow for this where it is viable and practicable. The size distribution of development sites coming forward in Worcester is such that the lower threshold evidently makes a substantive difference in terms of the number of affordable housing units to be sought.

7.3 I do not find that the evidence base for the affordable housing policies has been shown to be seriously deficient, and I conclude that it provides adequately robust and credible support as required by soundness test 7. There has been an objection that the Housing Requirements Study 2005 was not available electronically in accordance with Regulation 28 and that in consequence there is a failure to meet soundness test 4. It appears that the Council does not consider the Housing Requirements Study itself to be a ‘DPD document’ to which Regulation 28(3)(b) applies. The Council does confirm that the document was available for inspection. Its Statement of Community Involvement states that information relating to the Local Development Framework process will be made widely available through a variety of methods and that where possible it will be made available both in paper and electronic form. I am not satisfied that any shortcoming in this case is such as to make the DPD unsound. In any event there is no failure to meet soundness test 4 as that test relates to consistency with other ‘plans, policies and strategies’ rather than procedural requirements.

7.4 In conclusion, and having regard to current Government policy in PPS3, I find no critical deficiencies in the supporting evidence.

The flexibility of policies H7 and H7A

7.5 The proportion of affordable housing sought by policies H7 and H7A is a substantive increase on the 30% in policy H10 of the adopted Local Plan. Yet it is not evident to me that it is excessive or likely to be incompatible with creating a mixed community. The Council has had a good deal of success in agreeing amounts of affordable housing pursuant to Local Plan policy H10. This experience and the results of its consultations have reasonably been taken into account in assessing the viability of the proposed increased proportion. Nevertheless, circumstances vary from site to site and the Council recognises that in a particular case it might need to take account of other demanding policy requirements or exceptional development costs that would make it impracticable or non-viable to provide the amount of affordable housing sought by the policy. There is therefore a need for some flexibility in the policies, and this is strengthened by the lack of a more rigorous and systematic viability assessment of the proposed thresholds and proportions.

7.6 I accept that the use of the words ‘seek’ and ‘based on’ does suggest some flexibility in the application of policies H7 and H7A. However, I share the view that this should be clarified. Paragraph 4.58 together with the policy wording could be interpreted as a
deliberate move to remove policy flexibility, especially as the alternative word ‘negotiate’ was used in the equivalent policies of both the adopted Local Plan and the Preferred Options Report of March 2006.

7.7 A possible economic viability issue is just one of several factors that might have to be taken into account in agreeing the proportion of affordable housing to be achieved on a housing development site. Such factors are considered in the Council’s supplementary planning guidance on affordable housing (SPG9). As recognised in paragraph 4.64 of the DPD this guidance would need to be revised to provide up to date support for the DPD. It would not be appropriate to rely on the revision of that document to provide the flexibility that should properly be built into the DPD. That is not to say that the DPD policies should contain detailed coverage of all the factors that might have a bearing on the amount of affordable housing that is eventually agreed. I can see the sense in the Council’s view that the DPD policies should provide a firm and clear ‘trigger’ for the need to include affordable housing in a housing development proposal. Once triggered, it is reasonable for all the detailed constraints applicable to a particular site and how they might affect arrangements for affordable housing provision to be considered in the light of the proposed supplementary planning document.

7.8 I therefore accept that it is not necessary to include those detailed constraints as additional separate criteria in policies H7 and H7A. Nor would it be sensible for the policy wording to be amended to ‘... negotiate up to 40% affordable housing ...’ as that would introduce considerable uncertainty as to the amount of affordable housing that the Council would be understood to normally expect. The best way of allowing the necessary degree of flexibility is to add a brief explanation to the reasoned justification to clarify the implications of the wording in the policy. This could state that although affordable housing based on 40% is sought by the policy, the Council would be prepared to consider a reduced proportion should it be demonstrated that there are particular circumstances / constraints at a site that would make it impossible to reconcile the proportion sought with an economically viable scheme. Such a limited amendment would not in my view require recourse to further public consultation or sustainability appraisal. It would provide the flexibility necessary to meet soundness test 9 and help avoid deterring development where there would be real difficulties in providing 40% affordable housing while meeting other policy requirements. If necessary further information of the kinds of circumstances and constraints that could be encountered could be included in the proposed supplementary planning document, which is already referred to in paragraph 4.64.

Tenure split

7.9 PPS3(24) indicates that local planning authorities should ensure a mix of tenure, particularly on large strategic sites. PPS3(29) goes on to say that separate targets for social rented and intermediate affordable housing should be set in local development documents, which should also specify the type of affordable housing needed in particular locations. But I do not take this to mean that a particular tenure split should necessarily be specified in the DPD. The tenure split normally sought by the Council is given in its supplementary planning guidance (SPG9). To deal with this in a supplementary planning document rather than in the DPD does not conflict with Government guidance as far as I can see, and I accept the Council’s view that this provides necessary flexibility in that the appropriate split might need to be varied in the light of new information, different
circumstances in different parts of the city, and what might be required in a particular location to contribute to a mixed community. Such considerations could be covered in more detail and updated more expeditiously in a supplementary planning document.

7.10 I find little merit in the argument that this simply allows the Council to achieve its preferred tenure split by the ‘back door’ route of its supplementary planning guidance. A new supplementary planning document would be necessary to relate to the DPD and would be subject to the regulated preparation process. I have no reason to doubt that its possible content on tenure split would be appropriate for Worcester City. I conclude that it is not necessary to specify a tenure split in the DPD to meet any of the soundness tests. Indeed, quite apart from the flexibility issue, to recommend the inclusion of a particular tenure split in the DPD would cause problems in terms of soundness test 7, as I have insufficient evidence to support one. Nor is it necessary for the policy to state that the tenure split will be negotiated on a site by site basis: it is already clear from the housing policy objectives and the reasoned justification for the affordable housing policies that the DPD aims to create mixed communities, and policy H8 indicates that tenure arrangements will be a consideration.

Wording of policy H7A

7.11 The Council’s Proposed Change to policy H7A corrects a mistake in the drafting of the policy and is necessary for the policy to be properly understood. Although it is important, I do not believe that it would be problematic to make the amendment at this late stage. While I therefore support it, I find that a similar amendment would also need to be made to paragraph 4.63 of the reasoned justification for the same reason and for consistency.

7.12 As indicated earlier, I do not find the 40% requirement in this policy to be excessive. That the proportion is based on site area is consistent with policy H7 and it is not evident that it means in practice that the majority of dwellings on an allocated site would have to be affordable housing.

Policy H8 - affordable housing schemes

7.13 Policy H8 makes the granting of planning permission dependent on proposals incorporating details of affordable housing schemes, including details of management, rents and costs. Its wording is not that of a spatial policy concerned with the use and development of land. It concerns the input of information and it deviates with guidance in PPS12(2.30), which states that policies should focus on achieving the outcomes required to meet the authority’s spatial vision. The only outcome apparent from policy H8 is that the details required are “to the satisfaction of the City Council”. Contrary to PPS12, this is vague and not clearly related to what the affordable housing policies are intended to achieve.

7.14 Paragraph 4.62 of the DPD already gives background information on what is required from applicants. The object is that a proportion of the dwellings proposed should meet the need for affordable housing (as defined in the DPD) and I accept that a policy is required in this respect, to complement policies H7 and H7A. I conclude that it would be appropriate for the policy to be reworded to ensure that the benefit of affordable housing is secured.
7.15 There is also concern about the implications for outline applications. Should the details sought in policy H8 not be included in an outline planning application the Council indicates that it is common practice for planning conditions on a permission (or for a ‘Section 106 Agreement’) to provide for the details to be considered at a later stage. It is difficult to reconcile this with the policy as it stands, because the policy clearly requires the details to be incorporated in the proposals in order for planning permission to be granted. It does not appear to allow for such details to be submitted later in fulfilment of a planning condition or agreement. Therefore I also doubt that the policy is coherent and drafted to work in the way that the Council intends. This could be overcome by expressing the policy not in terms of what details the applicant needs to submit, but in terms of securing the affordable housing required.

7.16 Part (c) of policy H8 requires details of “the ways in which the developer will ensure that the housing units are available in perpetuity”. I take it that the intention is for the units to be available as affordable housing in perpetuity. I can see why the Council favours the ‘in perpetuity’ requirement bearing in mind the considerable long term affordable housing needs of Worcester; but in view of the ‘right to buy’ legislation, which applies across the city, I doubt that it is realistic. It could also affect funding prospects. The Council’s statement acknowledges that that legislation supersedes any ‘perpetuity clause’ in a Section 106 agreement. Bearing in mind that the policy is not dealing with ‘rural exception’ cases, there is no support in PPS3 for the perpetuity clause. PPS3(29) states that local planning authorities should aim to ensure that provision of affordable housing meets the needs of both current and future occupiers; but it does not indicate that there could or should be means to ensure that a proposed affordable dwelling would remain affordable for ever. Indeed, the definition of affordable housing in Annex B of PPS3 recognises that affordability restrictions on a dwelling could be lifted, in which case there should be provision for the subsidy to be recycled for alternative affordable housing. This suggests that the policy should be stated in terms of safeguarding the benefit of affordability rather than the affordability of a particular unit in perpetuity. An alternative wording need not preclude arrangements in perpetuity in any particular circumstances where they might be appropriate.

7.17 For the above reasons I conclude that policy H8 is not sufficiently flexible to deal with various and changing circumstances, and that it is not the most appropriate in all the circumstances. On this basis it fails to meet soundness tests 7 and 9. In view of my references to Government policy it is also questionable whether it meets soundness test 4(b). However, I believe the purpose of the policy is vital to the coherence and effectiveness of the DPD’s affordable housing policies and that with some amendment it could be made sound. I therefore recommend the following amended wording: ‘Planning permission for residential development that includes an element of affordable housing will be granted subject to arrangements to ensure (a) the provision of the particular amounts and types/tenures of affordable housing, and (b) that the benefit of affordable housing is secured and that it is maintained for the future’. It is sufficiently clear that the requirements for part (a) would emerge from the preceding policies and from the supplementary planning document that is mentioned in paragraph 4.64 immediately before policy H8. The supplementary planning document could give further guidance to supplement all aspects of the policy, including arrangements for ensuring that the benefit of the proposed affordable housing endures.
8. MATTER 12 - PROVISION OF LIFETIME HOMES

8.1 In examining the issues relating policy H10 I do not find that the policy repeats the requirements of other policies or that it is contrary to national policy on housing densities. However, desirable though lifetime homes are, policy H10 itself is ineffectual. The source of the lifetime homes standards is unspecified and so it is not clear exactly how a new home would qualify. There is no indication of the total number of lifetime homes required in the city and no target or timescale to allow the policy to be monitored and to allow its success to be evaluated. The implementation of the policy is questionable as it states that the Council will ‘encourage’ a proportion of lifetime homes, without describing what form that encouragement would take or how it could be effective. In short the policy is vague, has no teeth and is not supported by a credible evidence base. I conclude that it is unsound in terms of soundness tests 7 and 8, and that it should be deleted.

9. OVERALL CONCLUSION

9.1 My report has concentrated on the matters I identified in my Examination, but I should add that I have no reason to question the soundness those parts of the DPD that I have not referred to above. I am satisfied that the procedural soundness tests 1, 2 and 3 have been met.

9.2 In relation to the other tests my findings lead me to conclude that parts of the DPD are unsound. However, I also conclude that this can be satisfactorily addressed by means of some deletions and modest amendments of the parts concerned. The required changes are not so significant as to have repercussions in terms of public consultation or sustainability appraisal.

9.3 Subject to these changes I conclude that the DPD satisfies the requirements of Section 20(5) of the 2004 Act and the associated Regulations, is sound in terms of Section 20(5)(b) and will adequately fulfil its intended purposes. The changes are set out formally below.

10. LIST OF CHANGES REQUIRED TO MAKE THE DOCUMENT SOUND

10.1 Add the following to the end of paragraph 1.2: ‘The Local Plan housing policies contain guidance for the development and management of housing land in Worcester City up to 2011. This Balanced Housing Market document reviews the allocated housing sites; assesses the need for more housing allocations and how the release of land should be managed; and addresses issues concerned with affordable homes. It does not replace all the Local Plan policies, some of which will now be saved until their role can be reviewed. It does not provide a policy background for the more strategic consideration of how much housing land will be required to meet housing growth during 2011 - 2026 associated with the Regional Spatial Strategy targets, as the options for such growth are currently under review and will be considered as part of a Core Strategy. Work on the Core Strategy is currently underway, covering the period to 2026. It will be the subject of separate public consultation.’

10.2 Delete policy H4(c) and paragraph 4.26.

10.3 Delete policy H6A together with paragraphs 4.36-37 and their associated heading.
10.4 Delete policy H6(c) and add the following sentence to the end of policy H6: ‘In addressing these requirements proposals should have regard to other policies and to the density and character of the surrounding area.’

10.5 Add the following paragraph to the reasoned justification immediately after policy H7: “In ‘seeking’ a proportion of affordable housing ‘based on’ 40% in policies H7 and H7A, the Council would be prepared to consider a reduced proportion should it be demonstrated that there are particular circumstances / constraints at a site that would make it impossible to reconcile the 40% proportion with an economically viable scheme.”

10.6 In policy H7A and in the third sentence of paragraph 4.63 replace the word “permissions” with ‘applications’.

10.7 Replace policy H8 with the following: ‘Planning permission for residential development that includes an element of affordable housing will be granted subject to arrangements to ensure (a) the provision of the particular amounts and types/tenures of affordable housing, and (b) that the benefit of affordable housing is secured and that it is maintained for the future’.

10.8 Delete policies H10 and H12.

10.9 Add the following to the annual indicators listed in paragraph 6.2:

- the number of gypsy and traveller pitches and sites that have been the subject of planning permissions

- densities of housing developments in relation to the location types in policy H6(b).

10.10 Add the following text to the end of paragraph 6.3: ‘For some forms of housing implementation will be through bodies other than the City Council. These include housing associations, the University of Worcester, private developers, and social services. The City Council will work closely with these organisations to ensure that housing provision meets the aims outlined in Chapter 3 of this document.’

10.11 In addition to the above I am content for any minor spelling, grammatical or factual matters to be amended by the Council so long as the underlying meaning is not altered. This includes amendments that are necessary in consequence of the above changes.

G C Cundale

Inspector
Inspectors Report
## Appendix 2 Glossary

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allocated sites</td>
<td>Refer to sites that have an allocated use e.g. housing.</td>
</tr>
<tr>
<td>Annual Monitoring Report</td>
<td>Produced by the City Council to provide an assessment of the progress made against targets and performance of policies. The monitoring period is April to March each year.</td>
</tr>
<tr>
<td>BME</td>
<td>Refers to the Black and Minority Ethnic population</td>
</tr>
<tr>
<td>Brownfield</td>
<td>(see Previously Development Land)</td>
</tr>
<tr>
<td>Core Strategies</td>
<td>Set out the key elements of the planning framework for the area. It is comprised of a spatial vision and strategic objectives for the area; a spatial strategy; core policies; and a monitoring and implementation framework with clear objectives for achieving delivery. Once adopted, all other documents must be in conformity with it.</td>
</tr>
<tr>
<td>Development Plan</td>
<td>The statutory development plan is the starting point in the consideration of planning applications for the development or use of land. The development plan will consist of the West Midlands Regional Spatial Strategy prepared by the West Midland Regional Planning Body, and Development Plan Documents prepared by the City Council, with Minerals Development Plan Documents prepared by Worcestershire County Council.</td>
</tr>
<tr>
<td>Development Plan Document</td>
<td>Spatial planning documents that are subject to independent examination. They can include the Core Strategy, Site Allocations, Area Action Plans, Proposals Map (where needed).</td>
</tr>
<tr>
<td>Empty Homes Strategy</td>
<td>Is a range of initiatives aimed at bringing empty privately owned homes back into use.</td>
</tr>
<tr>
<td>Greenfield land or site</td>
<td>Land (or a defined site) usually farmland, that has not previously been built on.</td>
</tr>
<tr>
<td>Housing commitments</td>
<td>Refers to housing which has planning permission.</td>
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<tr>
<td>Housing need</td>
<td>The quantity of housing required for households who are unable to access suitable housing without financial assistance.</td>
</tr>
<tr>
<td>Housing trajectory</td>
<td>A housing trajectory is a graph which reports on progress on housing supply by comparing past performance to future projections as anticipated by the local planning authority.</td>
</tr>
<tr>
<td>Key workers</td>
<td>Are defined as “those groups eligible for the Housing Corporation funded Key Worker Living programme and other employed in the public sector identified by the Regional Housing Board for assistance” (PPS3 Housing).</td>
</tr>
</tbody>
</table>
Glossary

Local Development Framework
Is not a statutory term, however, its sets out, in the form of a ‘portfolio/folder’, the Local Development Documents which collectively deliver the spatial planning strategy for the local planning authority’s area. The Local Development Framework will be comprised of Local Development Documents, and Supplementary Planning Documents. The Local Development Framework will also include the Statement of Community Involvement, the Local Development Scheme and the Annual Monitoring Report.

Major Urban Areas
In the West Midlands these are Birmingham, North Staffordshire (Stoke on Trent), Black Country and Coventry.

Mixed communities
Neighbourhoods with a more sustainable mix of tenures and incomes, leading to a diverse range of residents

Mixed use sites
Refer to sites allocated for a range of different uses e.g. housing, employment and retail, on an individual site

Moratorium
Withhold planning permission for housing on sites that have not yet been identified.

Previously developed land
(see Brownfield)
‘Previously-developed land is that which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure.’

The definition includes defence buildings, but excludes:
- Land that is or has been occupied by agricultural or forestry buildings.
- Land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures.
- Land in built-up areas such as parks, recreation grounds and allotments, which, although it may feature paths, pavilions and other buildings, has not been previously developed.
- Land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings).

There is no presumption that land that is previously-developed is necessarily suitable for housing development nor that the whole of the curtilage should be developed.

Regional Housing Strategy
The Regional Housing Strategy prioritises the housing needs of the region (by locations and/or types of expenditure) to allow decisions to be taken on how housing resources should be allocated within the region. It takes an overall view on regional housing need, housing investment priorities and affordable housing targets. This provides a regional context for local authorities in drawing up their own housing investment strategies and to identify regional priorities.
for housing investment to be funded through registered social landlords.

Regional Spatial Strategy

A strategy for how a region should look in 15 to 20 years time and possibly longer. The Regional Spatial Strategy identifies the scale and distribution of new housing in the region, indicates areas for regeneration, expansion or sub-regional planning and specifies priorities for the environment, transport, infrastructure, economic development, agriculture, minerals and waste treatment and disposal. The Regional Spatial Strategy is part of the development plan.

Shared equity

Refers to shared ownership, whereby the owner owns half of their property whilst the local authority owns the other half.

Spatial planning

Goes beyond traditional land use planning. It brings together and integrates policies for the development and use of land with other policies and programmes, which influence the nature of places and how they function. This will include policies which can impact on land use, for example, by influencing the demands on, or needs for development, but which are not capable of being solely or mainly through the granting of planning permission, but may be delivered through other means.

Statement of Consultation

A report or statement issued by local planning authorities explaining how they have complied with their Statement of Community Involvement during consultation on Local Development Documents.

Sustainability Appraisal (SA)

The Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be prepared with a view to contributing to the achievement of sustainable development. Sustainability appraisal is a systematic appraisal process. The purpose of sustainability appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a Local Development Document from the outset of the preparation process. This will ensure that decisions are made that accord with sustainable development.

Sustainable communities

Are places where people want to live and work, now and in the future. They meet the diverse needs of existing and future residents, are sensitive to their environment, and contribute to a high quality of life. They are safe and inclusive, well planned, built and run, and offer equality of opportunity and good services for all.

For communities to be sustainable, they must offer: decent homes at prices people can afford; good public transport; schools; hospitals; shops; a clean, safe environment.

People also need open public space where they can relax and interact and the ability to have a say on the way their neighbourhood is run.
Sustainable development

In broad terms, this means development that meets the needs of the present without compromising the ability of future generations to meet their own needs. The Government has set out five guiding principles for sustainable development in its strategy ‘Securing the future – UK Government strategy for sustainable development’. The five guiding principles, to be achieved simultaneously, are: Living within environmental limits; Ensuring a strong healthy and just society; Achieving a sustainable economy; Promoting good governance; Using sound science responsibly.

Windfall housing sites

Are sites not previously identified for housing in a Local Plan that become available for development. They consist of infill sites, disused land or vacant buildings, or sites in another use that become vacant or are available.
Worcester Local Development Framework
Telephone 01905 722233
www.worcester.gov.uk

Fax: 01905 722490
Email: ldf@cityofworcester.gov.uk
Post: Orchard House, Farrier Street, Worcester, WR1 3BB
Typetalk: 1800101905722233
DX:716287

This information is available in large print, Braille, PC disc, CD-ROM or DVD, and audio tape on request. Call 01905 722 230 or minicom (text telephone) 01905 722 156 for your copy.

Need help with English? Contact Ethnic Access on 01905 25121.

Bengali

Chinese (Cantonese)
“如需我們幫助你理解英文—聯繫 Ethnic Access（少數民族服務獲取組），電話：01905 25121 ”

Portuguese
‘Necessita de ajuda com o seu Inglês? – contacte Ethnic Access Tel.: 01905 25121’

Punjabi
ਇੰਗੀਜ ਭਾਸ਼ਾ ਦੀ ਸਹਾਇਤਾ ਚਾਹੁੰਦੇ ਹਨ – ਏਥਨਿਕ ਅਕਸੈਸ [Ethnic Access] ਨਾਲ ਸੰਤੀਸ਼ ਕਰੋ, ਟੇਲੀਫਨ: 01905 25121

Urdu
آپ انگریزی میں مدد جاہز ہیں؟ اثنیک اکسیس [Ethnic Access] سے ٹیلیفون: 01905 25121 مکمل کریں۔