

## **Broadwas and Cotheridge Neighbourhood Development Plan**

### **Background Paper No. 1 - Options for new housing development considered in preparing draft plan – with additional comments in respect of a draft Housing Needs Survey dated April 2018.**

#### **Background**

In 2016 the Parish Council (for both Broadwas and Cotheridge) resolved to prepare a Neighbourhood Development Plan (NDP) in order to have greater local influence over new housing development than simple reliance on the South Worcestershire Development Plan (SWDP) which is already due for review in the foreseeable future and the policies it contains thereby likely to change to an, as yet, unknown degree. (The NDP addresses other issues too, but the purpose of this Background Paper is to focus on provision for new housing).

The SWDP, as adopted in February 2016, had to grapple with housing land supply as a major issue. The technique it applied to rural areas was to categorise Villages/Settlements according to the facilities they possessed at the time of plan preparation, and to allocate sites to those villages considered to be best able to accommodate growth. Annex D of the SWDP sets out the village categories thus: Broadwas in Category 2, Cotheridge as Open Countryside.

An important issue for the Parish Council is that Broadwas was wrongly categorised into Category 2 when, according to the published criteria, it should have been no higher in the Settlement Hierarchy than Category 3.

A consequence of the categorisation appears to have been the allocation, in the SWDP, of two sites for development in Broadwas. These have now been developed with a total of 22 new dwellings. The Parish Council supported the development of those two sites as a means of meeting a demand for Affordable Housing as identified in the 2011 Housing Needs Survey. Neither site is within the “Development Boundary” shown on the SWDP Proposals Map – although they are next to it.

This further questions the role of the historic Development Boundary as a means to influence the choice of sites for development in Broadwas.

It is not a statutory requirement of NDPs to allocate sites for housing, especially when a “senior” plan, in this case the SWDP, has already done so, but it is sensible for the NDP making body to consider options for development where it would be in the interests of the community. The latest draft national planning policy guidance advises that: *“Neighbourhood Planning Groups should also consider the opportunities for allocating small sites suitable for housing in their area”* (Draft revised NPPF paragraph 70, March 2018)

Against the above background the Steering Group has considered the following options:

### **Option 1: Maintain the Status Quo**

This requires the existing Development Boundary shown on the SWDP Proposals Map to be simply replicated into the new NDP, with no new allocations outside it in Broadwas, and none at all in Cotheridge. This would be combined with the application of the SWDP policies for development in Open Countryside to manage development outside the Development Boundary

#### Advantages:

- Complete alignment with the adopted SWDP,
- no need to revisit the Strategic Housing Land Availability Assessment (SHLAA) or other evidence base for the SWDP,
- continuity with historic land use planning policies, and clear in its application.
- Has the (verbal) support of MHDC Planning Officers.
- Public consultation so far has not revealed any community desire to change the Development Boundary.

#### Disadvantages:

- The two SWDP allocated (and now developed) sites are outside the Development Boundary, which thereby questions its effectiveness
- no flexibility to allocate small sites elsewhere should a need arise.

Other consequences: The categorisation of Broadwas as a Category 2 village needs challenging to avoid the risk of further allocations outside the Development Boundary coming forward as part of the forthcoming SWDP review.

### **Option 2: Review (and by implication enlarge) the Broadwas Development Boundary**

#### Advantages:

- would allow for new development land to come forward in the SWDP review, with sites chosen by the local community through the NDP process rather than imposed by the reviewed SWDP (based, it is assumed, on the Category 2 status of Broadwas).
- Could create a new Development Boundary that accepts the reality of the two sites recently developed and thereby gains credibility as a realistic application of Development Boundary policy
- Would acknowledge and apply the principle of Draft NPPF paragraph 70 (indeed, of the current NPPF too which encourages NDP bodies to make their own housing land allocations)

#### Disadvantages

- Has no support from the local community particularly as the affordable housing developed within the two sites under the SWDP has not attracted demand from occupiers with local connections.
- Has no support from MHDC Planning Officers
- Potential inconsistency with the current SWDP
- SHLAA (and other evidence base) may need revisiting to help choose sites

### **Option 3 – Allow for small infill sites outside the Development Boundary by using other criteria**

Such other criteria could include a variety of rural planning techniques such as allowing frontage development to infill a modest gap between two existing properties notwithstanding the fact that one or both properties are outside the Development Boundary. Indeed, a length of frontages outside the Development Boundary could be defined where some infilling may be acceptable with limits to prevent built up frontages extending further out into open countryside. This could be possible, for example, in Butts Bank, or around the green at Broad Green (both in Broadwas Parish). (There is no obvious “gap” in the frontage at Cotheridge where such a technique would be appropriate).

## Advantages

- Allows for limited housing growth along built frontages that are already there, typically using side gardens and not agricultural land
- Could be seen as an application of the principle in Draft NPPF paragraph 70
- Is a technique that has been pioneered elsewhere and could be developed in a very specific and local context.
- There was some support for “small scale development” in the responses at the launch event on 20th May 2017, and there were also responses to suggest that such development could be on “Brownfield land”.
- Draft NPPF paragraph 85 allows for this type of policy (see Note 1 on the next page)

## Disadvantages

- It is not a technique promoted in the SWDP and would arguably be in conflict with it
- There is no identified need arising from the SWDP for further housing growth in Broadwas (or Cotheridge)
- The scale of development that this could enable has not been formally tested – although the Steering Group has noted that, due to the dispersed character of the existing development outside of the Development Boundary, it would be difficult to draft enforceable criteria to ensure that the character of these locations is not substantially affected. Furthermore, any such new sites would be on “greenfield” sites and thereby contrary to well established open countryside policies.
- It would require the development of a new type of policy for which there has been no public consultation.
- New housing in Butts Bank, for example, would have the issue of the absence of any footway down the road into the village core, and thus may be regarded as “unsustainable” as it would imply reliance on car travel for access. The same issue would arise for further development at Broad Green added to which that location is some distance (over 0.5 mile) from the existing Development Boundary.
- The definition of “Brownfield land” (in NPPF parlance “Previously developed land”) excludes residential gardens (in the existing NPPF the term used is “private residential gardens” whereas the draft revised version omits the word “private”). The nature of a policy to allow infill development between houses on, for example, Butts Bank or in Broad Green, would thus not be on “brownfield” land, i.e. “previously developed land”. (See note 2 on the next page for the definition of “previously developed land”).

## Analysis of Options

This issue has been discussed at length by the Steering Group who, on behalf of the parish council, have been charged with the responsibility of creating a draft NDP that is consistent with the “senior” plan, the SWDP, applies the principles of the NPPF and would command support from the local community covering the topics that have emerged as important to them as expressed in the early consultations (open day, public meetings and questionnaire). Advice from MHDC Planning Officers has also been sought which included the strong suggestion that the Development Boundary remain unchanged and Open Countryside Policies of the SWDP be applied elsewhere. On that basis **Option 1** above proved to be the one with the widest support and strongest justification. The Parish Council met to consider the Preliminary Draft of the NDP on 9th April 2018 and agreed to this approach.

This paper was prepared for NDP Steering Group in advance of meeting MHDC officers on 25th April 2018. Since then a draft Housing Needs Survey has been received and which is addressed in the Addendum below.

Note 1) Paragraph 85 of the draft NPPF

Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found outside existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land and sites that are well-related to existing settlements should be encouraged where suitable opportunities exist.

Note 2) definition of Previously Developed Land in the draft NPPF

Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This 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, where provision for restoration has been made through development control procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

## **Addendum: draft Housing Needs Survey Report dated April 2018.**

### Introduction.

A draft Housing Needs Survey (HNS) was presented to the Parish Council at its meeting on 14<sup>th</sup> May 2018. It was prepared by Gloucestershire Rural Community Council who were commissioned by Wolverley Homes Limited to “*investigate and identify the affordable housing needs of people who live, work or have close family ties to Broadwas and the adjacent parishes of Cotheridge, Doddenham, Lulsley and Wychenford*”. (HNS paragraph 4.1)

The survey was carried out by postal questionnaire. 662 questionnaires were sent out in March 2018 and 172 received, i.e. a response rate of 26%.

The survey followed a standard methodology and concluded that “*there are 13 households with a local connection who have identified themselves as being in need of affordable housing within the survey area over the next five years. A further 19 households with a local connection have identified themselves in need of open market housing within the survey area in the next 5 years*”.

### Analysis of the Report

1. The report does not explain the rationale behind the choice of study area, or examine the links (if any other than proximity), between the various parishes selected for study. Paragraph 3.1 of the HNS lists the number of residential properties in each parish and appears to be based on a significantly inaccurate assessment of the number of houses in Broadwas and Cotheridge. However, taking its figures at face value the two parishes together have 268 residential properties out of a total of 662 in the whole study area, i.e. 41%. Indeed, the largest parish (by the measure of house numbers alone) in the study area is Wychenford with 216 residential properties. Over half of the study area is therefore outside the boundaries of the Broadwas and Cotheridge NDP.
2. At paragraph 2.1 the study identifies Broadwas as a Category 2 Settlement in the SWDP but, as explained both above and in the NDP text itself, this was based on an erroneous assessment of the facilities in the village/parish. Broadwas should have identified in the lower Category 3. In the absence of evidence of a role for Broadwas as the principal service provider to the other parishes in the survey area there is no clear justification for their housing needs (such as may exist) to be met in Broadwas.
3. If, instead of focussing on Broadwas, the suggested housing need were evenly distributed through the study area on the basis of current housing distribution then the total of 13 affordable houses should be reduced to 6 for the Broadwas and Cotheridge NDP area and the total of 19 open market houses should be reduced to 8. These two figures represent the very highest figures that could be used for NDP purposes at this time.
4. Cotheridge is classified as Open Countryside in the SWDP and is thus not suitable for any new housing unless the special circumstances for rural exception houses can be shown. This would need to be done on a site specific basis rather than as a response to a more general housing need.
5. The HNS omits any mention of the three new dwellings granted permission on appeal at Zourka, Church Lane, Broadwas (Appeal reference APP/J1860/W/17/3191631) which would, in any event, reduce the apparent need for open market housing from the maximum of 8 suggested in paragraph 3 above to 5.
6. From the above paragraphs it can be seen that on, a simple quantitative assessment the *maximum* potential apparent need, the figures the HNS could possibly justify allocating to the NDP area are for 5 open market houses and 5 affordable ones.

7. Broadwas has, of course, seen the recent completion of the two sites allocated in the SWDP at Berryfields and Highcroft. The survey includes no details of whether those new houses have been occupied by people with the kind of local connection necessary to justify additional open market or affordable housing. This analysis, if carried out as part of the HNS, would help to demonstrate whether such local needs have been met for the time being.
8. The study also makes no mention of the very substantial West Worcester strategic housing site, most of which is in the two parishes which directly adjoin the NDP area i.e. Rushwick and Broadheath. In the SWDP this strategic site is identified as SWDP 45/2 Temple Laugherne (Worcester West Urban Extension) and is intended for around 2,150 dwellings of which 40% should be Affordable Housing (paragraph B iii of the policy). Parts of this very substantial strategic site are within 1 km of the Cotheridge parish boundary. In the light of this level of supply “on the doorstep” of the Broadwas and Cotheridge NDP area there is no need for new allocations in the NDP for land outside the Development Boundary.

## Conclusions

In the absence of:

- An accurate assessment of the number of dwellings and the breakdown of the figures between the parishes in the study area, and
- the justification (if any) for Broadwas as the principal focus for meeting any apparent housing need, and
- recognition that Broadwas was wrongly categorised as a category 2 settlement
- the existing distribution of houses within the study area (over half of which is outside the NDP area), and
- the recent appeal decision at Zourka, Church Lane, and
- any analysis of the take up of the recent developments at Berryfields and Highcroft, and
- any reference to the impact of the Worcester West Urban Extension site in close proximity to the NDP area and its role in meeting any perceived local need;

it is concluded that even the *maximum* figures for housing needs in the NDP area that could arise from the HNS i.e. 5 open market houses and 5 affordable units cannot be justified in addition to the nearby urban extension.

In any event the figures are so small that, even with the benefit of any demonstrable local need, they could easily be accommodated through annual monitoring of the NDP by modest infill developments within the Development Boundary such as, for example, subdivision of existing residential properties. The Rural Exception Sites policy, SWDP 16, can always be relied upon should a genuine case of local need arise in either Broadwas or Cotheridge for Affordable or other specialist housing.

There is, therefore, at this stage no need to change the current version (as presented to the Parish Council in April) draft NDP policies in response to this HNS.

Background Paper No.1 – as revised in July 2018