

**Affordable Housing  
Supplementary Planning  
Document**

**Statement of Consultation**

**April 2014**



**Wyre Forest** District Council

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## **1. Introduction**

1.1 This consultation statement has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The statement sets out who was consulted, when, and how, and summarises the representations received and how they have influenced the Draft Affordable Housing Supplementary Planning Document (SPD).

## **2. Name and Purpose of the SPD**

### ***Name***

2.1 Affordable Housing Supplementary Planning Document (SPD)

### ***Purpose***

2.2 The aim of this SPD is to help to meet housing needs and create mixed, balanced and sustainable communities by maximising the delivery of affordable housing. The SPD will clearly set out how the District Council's affordable housing policies should be interpreted. This will provide certainty and clarity for those bringing forward development within the District. Wyre Forest District Council's Development Plan is made up of the Adopted Core Strategy (2010), the Site Allocations and Policies Local Plan (2013) and the Kidderminster Central Area Action Plan (2013). The following District Council planning policies relate to the delivery of affordable housing:

- Adopted Core Strategy - CP04 – Providing Affordable Housing
- Site Allocations and Policies Local Plan – SAL.DPL2 – Rural Housing
- Site Allocations and Policies Local Plan - SAL.DPL3 – Financial Viability

2.3 The Affordable Housing SPD is being prepared to provide more detailed guidance on the District Council's expectations for the delivery of affordable housing in accordance with these policies. It explains how developers, landowners and Registered Providers (RPs) should interpret the District's affordable housing policies.

2.4 The District Council adopted a Planning Obligations SPD in February 2007. This document sets out detailed guidance on developer contributions in relation to a number of topics including affordable housing. Once adopted, the Affordable Housing SPD will replace Section 4 of the Planning Obligations SPD.

2.5 The Council also published an Affordable Housing Toolkit in April 2011. The toolkit outlines the expected design and quality standards, the basis for negotiating the percentage of housing which should be affordable on S106 sites, and details of the WFDC Registered Provider Partners. Once adopted, the Affordable Housing SPD will also replace this toolkit.

### **3. Who was consulted on the SPD?**

3.1 The Early Engagement consultation was targeted towards those organisations and individuals with an interest in affordable housing. The statutory consultees set out within Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012 were consulted. Appendix 1 lists those organisations consulted at the Early Engagement stage. A collaborative approach has been taken to preparing the SPD. Colleagues within Housing Services, as well as other Council departments, have been directly involved with the preparation of the SPD.

### **4. How Were People Consulted?**

4.1 The consultation period ran from 3<sup>rd</sup> October to 1<sup>st</sup> November 2013. A leaflet was prepared which covered the following issues:

- What is an Affordable Housing SPD and Why is it Needed?
- Which are the Current Relevant Planning Policies?
- Proposed Issues to Be Addressed
- Consultation Questions

4.2 The consultation leaflet was sent with a covering letter to those consultees listed within Appendix A in time for the start of the consultation. The leaflet was also posted on the District Council's web-site and consultation portal which allowed electronic responses. Copies of the leaflet were placed in the Worcestershire Hub in Kidderminster and the libraries in Kidderminster, Stourport-on-Severn and Bewdley. A press release was prepared to mark the start of the consultation and this was shared on the District Council's Facebook and Twitter accounts.

4.3 A stakeholder workshop was held during the consultation period and Registered Providers and developers who have recently been active within the area were invited to attend. Appendix B sets out summary notes from the workshop.

### **5. Summary of Responses**

5.1 A total of 18 representations were received from 14 respondents. Of these, 11 responses were from organisations and 7 were from individuals.

5.2 Five statutory consultees responded to the consultation.

5.3 All of the responses were either in support of the SPD or raised comments in relation to its proposed content. No objections to the SPD were received

5.4 Summaries of all representations received and the District Council's response to each one can be found in Appendix C.

## 6. Summary of the Main Issues Raised

### 6.1 The main issues raised were:

- Concerns relating to the desire for home ownership and the Government's encouragement of this.
- Suggestion that the SPD should address SuDS in affordable housing development.
- Suggestion that a formula for calculating off-site affordable housing contributions should be included.
- A number of representations promoted specific sites for affordable housing development.
- Some concerns were raised over the viability of the affordable housing contributions required.
- Concerns were raised over the different planning application fees for different value developments.
- Suggestion that all affordable housing developments are built to 'Secured by Design' standards.
- Some concerns were raised in relation to the demographics of the District's population and that a simple percentage requirement may not generate the right type of properties.
- Suggestion that the SPD should be used to increase the delivery of affordable housing as the current delivery of 60 dwellings per annum is significantly below the need identified within the SHMA.
- Suggestion that the SPD should not add new requirements which impede the delivery of affordable housing.
- Suggestion that the SPD should overcome the inconsistency between the 30% affordable housing requirement in the Adopted Core Strategy and the 'up to' 30% requirement in the Affordable Housing Toolkit and Planning Obligations SPD.
- Suggests that the SPD should introduce cross-subsidy of affordable housing with market housing on rural sites in accordance with the NPPF policy.
- Suggestion that the title should be changed to Local Needs Housing SPD.
- Concerns that affordable housing is more basic in design than market housing and often smaller than Government minimum standards.
- Suggestion that the SPD should also address:
  - Consistency with neighbourhood plans.
  - Avoiding regional pressure on Green Belt for overspill developments.
  - Monitoring and implementation of the Local Lettings Policy.
  - Community Right to Build on exceptions sites as identified in neighbourhood plans.
- Suggestion that it should be made easier to build housing within the District and some off-site planning obligations should be removed because of viability considerations.

- Suggestion that the SPD should include a clear specification on size of rooms and living space in the design of affordable units of accommodation.

**7. How have those Issues been addressed in the SPD?**

- 7.1 The table at Appendix C sets out how each of the comments made has been considered within the Draft SPD.

## **Appendix A: List of Consultees**

### **Specific Consultees**

#### **Wyre Forest District Parish/Town Councils**

Bewdley Town Council  
Broome Parish Council  
Chaddesley Corbett Parish Council  
Churchill and Blakedown Parish Council  
Kidderminster Charter Trustees  
Kidderminster Foreign Parish Council  
Rock Parish Council  
Rushock Parish Council  
Stone Parish Council  
Stourport-on-Severn Town Council  
Upper Arley Parish Council  
Wolverley & Cookley Parish Council

#### **Adjacent Parish Councils**

Abberley Parish Council  
Astley & Dunley Parish Council  
Bayton Parish Council  
Belbroughton Parish Council  
Clent Parish Council  
Clebury Mortimer Parish Council  
Dodford with Grafton Parish Council  
Elmbridge Parish Council  
Elmley Lovett Parish Council  
Hagley Parish Council  
Hartlebury Parish Council  
Highley Parish Council  
Kinlet Parish Council  
Kinver Parish Council  
Milson & Neen Sollars Parish Council  
Pensax Parish Council  
Upton Warren Parish Council

#### **Other Specific Consultees**

British Telecom  
Bromsgrove District Council  
Central Networks  
Dudley Metropolitan Borough Council  
English Heritage  
Environment Agency  
Greater Birmingham and Solihull Local Enterprise Partnership  
Hereford & Worcester Ambulance Service  
Hereford & Worcester Fire & Rescue Service  
Highways Agency  
Homes & Communities Agency  
Malvern Hills District Council

Mobile Operators Association  
National Grid  
Natural England  
Network Rail  
Office of Rail Regulation  
Oil and Pipelines Agency (The)  
Severn Trent Water Ltd  
Shropshire Council  
South Staffordshire District Council  
South Staffordshire Water Plc  
South Worcestershire Development Plan  
Staffordshire County Council  
Staffordshire Police Authority  
The Coal Authority  
The Planning Inspectorate  
Transco West Midlands Local Distribution Zone  
West Mercia Constabulary  
West Midlands Strategic Health Authority  
Western Power Distribution  
Worcestershire County Council  
Worcestershire Local Enterprise Partnership  
Worcestershire Primary Care Trust  
Wychavon District Council

## **General Consultees**

Organisations registered in the Planning Policy database including:

- agents
- developers
- education and youth groups
- housing interest groups
- land owners
- local interest groups
- registered providers
- service providers

Organisations/Individuals that made responses relating to housing at the various consultation stages for:

- Core Strategy
- Site Allocations & Policies Local Plan
- Kidderminster Central Area Action Plan



## **Appendix B – Stakeholder Workshop Notes**

**Details:** Tuesday 8<sup>th</sup> October 2013, 10am, Wyre Forest House

### **Attendees:**

Neil Peggs – Worcester Community Housing

Chris Burton – Tetlow King

Sophie Bell – Sanctuary

David Owen – Wyre Forest CHG

Maria Dunn – WFDC

Kate Bailey – WFDC

Kevin Robinson – WFDC

### **Overview of Key Points**

The purpose of the workshop was outlined and background information was provided as to the reasons for preparing the Affordable Housing SPD, the purpose of the SPD and the topic areas which the SPD is likely to cover. The Greater Birmingham and Solihull LEP Housing Study was raised and the importance of this piece of work and the potential implications for the District were outlined.

Discussion focussed around the consultation questions set out within the Early Engagement Leaflet as follows:

#### **Do you feel it is appropriate for the District Council to prepare an affordable housing SPD?**

There was support for the preparation of the SPD and the principle of providing detailed guidance on the delivery of affordable housing within one document. There was also support for translating the Affordable Housing Toolkit into the SPD as this will add to its profile and weight.

#### **Do you agree that the proposed issues to be addressed are appropriate?**

There was support for the range of issues to be considered and some specific comments were made and questions were raised as follows:

- There was some discussion around improved design standards and how this would align with the current HCA requirements. It was suggested that the requirement for improved standards was tied back to the HCA grant funding conditions as this would give the document longevity. This was considered to be particularly important in light of the current Housing Standards Review consultation.
- Viability considerations were discussed and it was considered to be important that any viability policies were sufficiently robust to ensure that affordable housing was still delivered as close to the 30% requirement as possible. Reference was made to the Site Allocations and Policies Local Plan viability policy and the fact that external advice has been sought on viability assessments and these have been successfully challenged on a number of occasions. Particular concern was raised with regard to the assumptions made for the additional costs of delivering HCA compliant affordable housing units.

- It was suggested that the authority should consider using a claw back agreement to monitor the assumptions in the viability assessments as schemes are developed out and reconsider affordable housing contributions where necessary.
- There was some discussion around housing need and whether the need figures have been challenged as a way of justifying a reduced contribution. However, it was emphasised that the need for affordable housing is greater than the overall anticipated housing supply during the plan period and that the SHMA and Home Choice Plus data provide a robust evidence base to justify the affordable housing policies which have been tested through Examination in Public and provide the context for preparing the SPD.
- Further work will be undertaken to prepare a detailed analysis of need by Ward and this will inform the evidence relating to need set out within the Full Draft SPD.
- A question was raised in relation to housing for older people. It was confirmed that the delivery figures include affordable housing for elderly people however; the delivery of these types of properties is extremely limited.
- A question was raised relating to the preparation of suggested wording for S106 agreements and it was confirmed that this is being developed by a sub-group of the Worcestershire Housing Delivery Group.
- The question as to whether or not affordable rent properties should be allowed to count as affordable provision on S106 sites was raised. It was considered that it was good practice to try and deliver social rent properties rather than affordable rent. However, it was acknowledged that there is a relationship with viability and that it may be necessary to choose whether to have fewer properties which are social rent, or more properties which are affordable rent. It was also acknowledged that as the NPPF definition of affordable housing includes affordable rent, the SPD could not exclude affordable rent properties from its definition of affordable housing.

### **Concluding Remarks**

The next steps in the process of preparing the Affordable Housing SPD were outlined together with the timescales for adoption.

Attendees were invited to submit further comments in writing before the close of the consultation on Friday 1<sup>st</sup> November.

### Appendix C: Early Engagement Consultation - Summary of Representations Made and Officer Responses

Respondent/ Response No	Support/ Object/ Comment?	Summary	Officer Response
Core 11 <a href="#">AHEE3</a>	Support	Makes a number of observations in relation to affordable housing including the desire for home ownership and the Government's encouragement of this; that rental accommodation stalls home ownership; that many family homes in the private sector are occupied by pensioners who would move if affordable housing was available.	Comments are noted. The SPD will consider these issues based on the evidence base that demonstrates local needs.
Wyre Forest District Council <a href="#">AHEE4</a>	Comment	Would like to see the SPD address SuDS in developments. It is often perceived that SuDS are more expensive than traditional drainage and this can impact on the viability of a site. However, SuDS can reduce flood water and provide water quality treatment. The Core Strategy already requires SuDS in new developments and this will be further formalised when the Flood and Water Management Act is implemented. Incorporating SuDS at the masterplanning stage has a significant effect on their viability and cost-effectiveness.	Comments are noted. Information relating to the implementation of SuDS will be included within the design chapter of the SPD. It should be noted that the Council will shortly be commencing a review of the Design Guidance SPG and this will also include a section on SuDS in new developments.
Wychavon District Council <a href="#">AHEE5</a>	Comment	Supports the preparation of the SPD and is in agreement with the suggested topics. Suggests also including a formula for off-site contributions that the Council may seek when on-site provision is not possible or desirable. Would like to comment on the draft SPD when it is issued.	Comments are noted and support is welcomed. The SPD will include a formula for calculating off-site contributions. Wychavon will continue to be consulted as the SPD progresses.
Mr S Rawlings <a href="#">AHEE6</a>	Comment	Promotes a site off Offmore Lane for affordable housing development.	The SPD cannot allocate sites for development; it can only provide additional information for implementing

Respondent/ Response No	Support/ Object/ Comment?	Summary	Officer Response
			<p>existing planning policies and site allocations. The respondent will need to submit details of the site for inclusion in the next Local Plan Review which is scheduled to commence in 2015.</p> <p>The issues referred to with regard to access dispute relate to Worcestershire County Council as the Highway Authority rather than the District Council.</p>
Octavian Development & Construction <a href="#">AHEE7</a>	Comment	Promotes land at Stanklyn Lane Farm for affordable housing development.	<p>The SPD cannot allocate sites for development; it can only provide additional information for implementing existing planning policies and site allocations. The respondent will need to submit details of the site for inclusion in the next Local Plan Review which is scheduled to commence in 2015.</p>
Mr L Harris <a href="#">AHEE8</a>	Object	Raises concern over the viability of a specific development site within Stourport because of the level of affordable housing required.	Comments are noted. The Adopted Site Allocations and Policies Local Plan sets out a detailed policy in relation to site viability. The Affordable Housing SPD will provide further information relating to the implementation of this policy.
Mr Harris <a href="#">AHEE9</a>	Object	Planning charges for developments are currently £385 per dwelling no matter if the dwelling is 20 £1m houses or 20 affordable flats.	Comments are noted, however, this is not a matter for the Affordable Housing SPD as planning charges are set nationally.

<b>Respondent/ Response No</b>	<b>Support/ Object/ Comment?</b>	<b>Summary</b>	<b>Officer Response</b>
Mr Aston <a href="#">AHEE10</a>	Comment	Suggests incorporating Secured by Design into the Affordable Housing SPD both in terms of layout and physical security.	Comments are noted and will be given further consideration in the drafting of the SPD. These comments will also be relevant for the review of the Design Guidance SPG.
Mr D Bond <a href="#">AHEE11</a>	Comment	Promotes land at Chester Road allotments for the development of affordable housing.	The SPD cannot allocate sites for development; it can only provide additional information for implementing existing planning policies and site allocations. The respondent will need to submit details of the site for inclusion in the next Local Plan Review which is scheduled to commence in 2015.
Chaddesley Corbett Parish Council <a href="#">AHEE12</a>	Support	Raises concerns about the demographics of the District's population especially the increasing proportion of elderly residents. Suggests that simple percentage based requirements are not sufficient for generating enough affordable housing of the right format and design to meet the needs of the aging population. Thought also needs to be given to the location of new units in terms of access to services and facilities. The proposed SPD is a good start but the ageing population requires a more strategic response including involving health and social services.	Comments are noted. Careful consideration is given to the type of affordable housing required on a site by site basis according to evidence of local need and the SPD will set out further details relating to this process. Consideration is also given to the location of sites and their access to services and facilities and on occasions, it is more appropriate to accept an off-site contribution to affordable housing rather than provide units on-site.
Mr P Rawlings <a href="#">AHEE13</a>	Support	Promotes a site in Offmore Lane for affordable housing development.	The SPD cannot allocate sites for development; it can only provide additional information for implementing

Respondent/ Response No	Support/ Object/ Comment?	Summary	Officer Response
			existing planning policies and site allocations. The respondent will need to submit details of the site for inclusion in the next Local Plan Review which is scheduled to commence in 2015.
West Midlands HARP Planning Consortium <a href="#">AHEE14</a>	Comment	<p>Comments made by Tetlow King on behalf of West Midlands HARP Planning Consortium.</p> <p>Suggests that SPD should be used to increase the delivery of affordable housing and refers to the level of need for affordable homes and backlog identified within the SHMA. Monitoring has shown that delivery is averaging around 60 affordable dwellings per annum which is below the level of need identified.</p> <p>Suggests that the SPD should not introduce any new matters which may impede on, or add burden to, the delivery of affordable housing.</p> <p>Suggests that the SPD should be used to overcome the inconsistency between the 30% affordable housing requirement set out within the Adopted Core Strategy and the 'up to' 30% requirement in the Affordable Housing Toolkit and Planning Obligations SPD.</p> <p>Suggests that the SPD should introduce cross-subsidy of affordable housing on rural exception sites with limited market housing in accordance with the NPPF policies.</p>	<p>Comments are noted and support for the SPD is welcomed.</p> <p>Delivery of affordable housing during the plan period has averaged 60 dwellings per annum, whilst it is acknowledged that this is significantly below the need identified within the 2012 SHMA, it is in accordance with the adopted Core Strategy target and this was subject to detailed scrutiny and viability testing at the examination.</p> <p>The SPD will replace the Affordable Housing Toolkit. It will also replace the affordable housing section of the Planning Obligations SPD which is itself due to undergo a review commencing in 2014.</p> <p>The Site Allocations and Policies Local Plan (July 2013) introduces an allowance for market housing on rural exception sites in order to cross-subsidise the delivery of affordable housing. The SPD will provide more detailed guidance on the implementation of this policy.</p>

Respondent/ Response No	Support/ Object/ Comment?	Summary	Officer Response
Churchill and Blakedown Parish Council <a href="#">AHEE15</a>	Comment	Provides background to the Parish Council's interest in the SPD.	Comments are noted.
Worcestershire County Council <a href="#">AHEE16</a>	Comment	Worcestershire County Council has no comment to make at this stage. However, the County Council would welcome the opportunity for future engagement in the development of this document.	Comments are noted. The County Council will continue to be consulted as preparation of the SPD progresses.
Churchill and Blakedown Parish Council <a href="#">AHEE17</a>	Comment	Supports the preparation of an affordable housing SPD but suggests that it should be widened to cover local needs housing and called the Local Needs Housing SPD.	Comments are noted and support is welcomed. The main remit of the SPD is to provide further information to support the delivery of Affordable Housing; therefore, it will remain as the Affordable Housing SPD.
Churchill and Blakedown Parish Council <a href="#">AHEE18</a>	Comment	The response makes comments in relation to the topics which it is proposed that the SPD will cover as follows: Delivery and need - feels the issue should be covered and questions the future need for shared ownership to address the fall in home ownership and rise in private rental. Elderly incomers - feels that this issues in not appropriate for the SPD. Most elderly incomers are likely to be looking to market housing to meet their needs. Feels the issues are downsizing and specialist housing to meet the needs of elderly local residents as well as the	Comments are noted and support is welcomed. The District Council would welcome specific policies within the Neighbourhood Plan relating to viability and design standards. The issues raised in relation to migration from the conurbation are a matter that is being addressed through the Greater Birmingham and Solihull Local Enterprise Partnership Spatial Plan for Recovery and Growth. Policies within future Development Plans

Respondent/ Response No	Support/ Object/ Comment?	Summary	Officer Response
		<p>desirability of continuing polices to deter inward migration from the conurbation with a view to safeguarding the Green Belt.</p> <p>Financial viability - Yes, this is particularly important in the rural areas where there is less developable space. Neighbourhood Planning can assist with this.</p> <p>Other financial issues - agrees that this should be covered, particularly the issue of off-site contributions to direct finance for affordable housing to where it is most needed.</p> <p>Design Standards - yes, neighbourhood planning can assist here. Affordable housing is frequently more basic in design than market housing and individual units smaller than Government minimum standards. It can also be too dense to achieve an overall build density on mixed sites and should be scattered throughout the development.</p> <p>Agrees that monitoring and S106 agreements should also be covered.</p>	<p>will need to have regard to this.</p>
<p>Churchill and Blakedown Parish Council <a href="#">AHEE19</a></p>	<p>Comment</p>	<p>The response makes comments in relation to additional areas which the SPD should include as follows:</p> <p>Consistency with neighbourhood plans, particularly the Churchill and Blakedown Neighbourhood Plan which is currently being prepared.</p> <p>Avoiding regional pressure on WFDC from neighbouring authorities to develop affordable housing in the Green Belt for overspill, especially where other LPAs own land within the District.</p> <p>Monitoring and implementation of WFDC's local lettings policy. The possible establishment of local link to open market housing in the rural</p>	<p>Comments are noted.</p> <p>The District Council will continue to work closely with the Parish Council in preparing the Neighbourhood Plan and will provide advice in relation to general conformity with the District's Development Plan and the National Planning Policy Framework.</p> <p>The SPD can not allocate sites for development. Should the District need to accommodate additional dwellings under the Duty to Co-operate, this would</p>



Respondent/ Response No	Support/ Object/ Comment?	Summary	Officer Response
		<p>areas most at risk, especially within the Green Belt.</p> <p>Community Right to Build on exceptions sites as identified by Neighbourhood Plans.</p>	<p>be addressed through a Plan review and if necessary a strategic review of Green Belt boundaries. It would not be a simple case of releasing land from the Green Belt because it is owned by an LPA with a housing need which it can not accommodate within its own boundary.</p> <p>Consideration will be given to including monitoring of the Local Lettings Policy within the SPD. It is not legally possible to introduce a policy which restricts the sale of open market housing to those with a local connection.</p> <p>The Community Right to Build Order provides the opportunity for communities to grant outline planning permission for development which is contrary to the Development Plan. By its nature, each proposal would need to be considered on its own merits and would be subject to an examination and community referendum. Therefore, it is not considered appropriate to include this within the SPD.</p>
Stourport on Severn Town Council	Comment	Suggests that it should be made easier for developers to build housing within the District and because of viability issues some of the restrictions with regard to off-site planning obligations must be	Comments are noted and support is welcomed. The SPD will include a clear minimum size for affordable units.

Respondent/ Response No	Support/ Object/ Comment?	Summary	Officer Response
<a href="#">AHEE20</a>		<p>removed and the District Council should be encouraged to give support to affordable housing developments. Supports the Help to Buy scheme and hopes that it will be extended for the foreseeable future.</p> <p>Suggests that SPD should include a clearer specification on size of rooms and living space in the design of affordable units of accommodation.</p>	