

Town and Country Planning Act 1990 (as amended)

Section 78 Appeal at Public Inquiry

Local Authority Ref: W/23/02112/OUT

Planning Inspectorate Ref: APP/H1840/W/24/3347643

Proposal: Planning application for the demolition of existing farmhouse, agricultural buildings and structures, the erection of a phased development of up to 300 residential dwellings (Use Class C3) and associated public open space, drainage, infrastructure and engineering works with all matters reserved except access.

Location: Orchard Farm, Defford Road, Pershore, WR10 3BX

Rebuttal- Affordable Housing Proof of Evidence

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Senior Planning Officer (Policy)

Wychavon and Malvern Hills District Councils

1.0 Introduction and Qualifications

- 1.1 My name is Denise Duggan. I am a chartered town planner, a member of the RTPI with experience working in the public sector. I am employed as a Senior Planning Officer (Policy) for Malvern Hills and Wychavon District Councils.

- 1.2 My evidence relates to the appeal ref, APP/H1840/W/24/3347643 in respect of the outline planning application ref, W/23/02112/OUT (the application) for the demolition of existing farmhouse, agricultural buildings and structures, the erection of a phased development of up to 300 residential dwellings and associated public open space, drainage, infrastructure and engineering works with all matters reserved except for access. addresses the Council's objections to the proposal in this appeal against non-determination.

I have set out points of rebuttal below in respect of the appellant's Affordable Housing Proof of Evidence from Alison Meigh.

2.0 Weight to be applied to need for Affordable Housing:

2.1 It is agreed that there remains an outstanding need for affordable housing in Wychavon but the weight to be applied to it is considered to be significant rather than very significant as stated in the appellants proof at para 6.9.

2.2 The following table (extract from page 26 of the AMR 2023 [South Worcestershire Authorities Monitoring Report 2023.pdf](#)) shows that there has been a high number of affordable housing delivered in Wychavon since 2013/14 with many schemes coming forward which met the new policy requirement of the (at that time) emerging policy SWDP15. The SWDP was adopted in 2016 and the delivery has been consistently high since with a dip during the Covid pandemic as would be expected.

Affordable Housing

8.10. Part 4b (i) of SWDP 3 gives the total affordable housing requirement for the plan period of 8,800. If this figure is annualised (8,800/24 years), this suggests a yearly south Worcestershire requirement of 367 affordable dwellings (N.B. although there is no annual target in the plan). The delivery of 623 in the monitoring period is well above this annualised figure.

Table 15: Number of Affordable Homes completed per annum (2006/07 to 2022/23)

Sub area location	2006/7	2007/8	2008/9	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2006 to 2023 Total
Worcester City	70	88	147	82	20	114	65	100	120	257	84	99	76	65	63	154	50*	1654
Malvern Hills	39	23	100	51	74	115	8	53	95	117	90	188	180	152	254	196	153	1888
Wychavon **	26**	34**	51**	0	58	57	154	258	257	217	193**	379	466	247	187**	248	278	3110
WWA Malvern Hills	0	0	0	0	0	0	0	0	0	0	0	0	0	0	24	7	78	109
WWA Wychavon	0	0	0	0	0	0	0	0	0	51	65	25	44	37	31	18	34	305
South Worcestershire	135	145	298	133	152	286	227	411	472	642	432	691	766	501	559	623	593	7016

*Worcester City Council have discovered that the affordable housing completions for the monitoring year 2021/22 have been overcounted by 29 units. To rectify this issue, the same number (29) has been subtracted from the completions for the monitoring year 2022/23. Therefore, the total number of affordable housing completions for 2022/23 has been recorded as 50 units (79 units -29 = 50).

** Wychavon, findings on data checks completed 28.12.23 confirm that years 2006/07 (36), 2007/08 (64), 2008/09 (57), 2016/17(191) and 2020/21 (85) have now been updated to what is outputting on the new DEF MasterGov database following migration of all data from the Access database to DEF in the monitoring year 2017.

2.3 It is accepted that the levels were lower prior to the adoption of the SWDP in February 2016 but the policy at that time in the adopted Wychavon District Local Plan, Policy COM2, sought 30% on sites in towns of 15 dwellings or more, or 0.5Ha or more whichever was the lesser. This helps to explain the lower levels of affordable housing brought forward in the past that are referred to in para 5.10 of the appellant's proof.

- 2.4 The current policy, SWDP15, seeks 40% on all sites of 15 or more dwellings but has a lower target for smaller sites with 30% sought on sites of 10 to 14 units and 20% on sites of 5 to 9 units and a financial contribution for sites below 5 units. This phased approach still applies in full to the Designated Rural Areas, which cover most of the Wychavon rural parishes but elsewhere only major sites (as per NPPF, para 65) trigger the need for affordable housing. These policy nuances have impacted on the provision of affordable housing in e.g. towns such as Pershore but only to a limited extent because the majority of allocations in the adopted plan and all of the allocations in the emerging SWDP Review are for more than 10 dwellings.
- 2.5 The appellants Para 5.22 and Table 4 is incorrect. The S106 for the application 20/02517/FUL shows all 54 of the units (gross) proposed at Almonry Close, Pershore were affordable, so allowing for the demolition of 37 existing units, a net increase of 17 affordable dwellings is correct compared with the 7 quoted in the table – so an increase of 10 affordable units, this changes the total to 51 so an annual figure of 10 affordable dwellings not the 8 quoted. In addition, there are pending applications for development at Pershore, including 94 dwellings (of which approx. 38 are affordable) land off Wyre Rd (W/22/01597) and 112 dwellings (of which approx. 44 are affordable) at Holloway, Pershore (W24/00270) – both of these applications are on land allocated in the emerging SWDP Review.

3.0 Tenure Split of Affordable Housing:

- 3.1 The appellants statement (para 5.31) considers that the site should provide a tenure split of affordable housing with 25% First Homes, 60% social/affordable rent and 15% affordable home ownership. This, it is argued, complies with the PPG which states '*Once a minimum of 25% of First Homes has been accounted for, social rent should be delivered in the same percentage as set out in the local plan. The remainder of the affordable housing tenures should be delivered in line with the proportions set out in the local plan policy.*'
- 3.2 Policy SWDP15 does not set a tenure split, the policy states it will be subject to negotiation. The tenure split is given in the Affordable Housing SPD which states (para 3.29) 80% social rent and/or affordable rent and 20% intermediate however this references the 2012 SHMA. The latest SHMA Update (2021) [Malvern Hills, Worcester City and Wychavon Strategic Housing Market Assessment 2021 Update](#), recognises the 25% First Homes requirement but explains why a higher percentage of the remaining affordable units should be social rented properties and gives the following recommended tenure split of 25% First Homes, 69%

social rented and 6% affordable home ownership. The reasons given for this are in para 4.29 and 4.30 of the SHMA Update (2021) which state:

4.29. However, Homes England have identified south Worcestershire councils as falling within high affordability pressure areas where the difference between the average social rents and private rents is £50 each week or more ([List areas of high affordability pressure - GOV.UK](#)).

4.30. Therefore, given the acute need for social rented accommodation across the SWDP area, it is recommended that 69% of new affordable housing is social rented, 6% affordable home ownership and 25% affordable home ownership through First Homes....

- 3.3 In light of the findings in the SHMA Update (2021), the council seeks a higher percentage of social rented housing because social rent is the tenure that is most likely to help people in acute housing need because of its greater affordability than other forms of affordable housing such as Affordable Rent and affordable ownership products.