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L 210406 KOR NPlan Submission Issue



Planning Policy
Wychavon District Council
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Dear Sirs

Response to the submission Ombersley and Doverdale Neighbourhood Development Plan 2020-2030 -Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, Submission consultation On behalf of Ombersley Conservation Trust (OCT)

Savills is instructed by Ombersley Conservation Trust (OCT) to respond to the Submission consultation of the Ombersley and Doverdale Neighbourhood Development Plan 2020-2030.

On behalf of OCT, Savills has been proactively engaging with Tomorrow's Ombersley and Doverdale (TOAD) in support of the emerging Ombersley and Doverdale Neighbourhood Plan since 2017.

The Trust fully supports the Neighbourhood Development Plan and its aspirations to shape the future of development in the parish, and to safeguard community facilities and the area's distinct character. TOAD and the community are to be congratulated in progressing the Neighbourhood Development Plan to submission. It is an impressive and comprehensive document and OCT particularly welcomes any Neighbourhood Plan that plans positively for additional housing development to support the delivery of housing the Wychavon district.

Context

As TOAD is aware, OCT has significant land interests in Ombersley and the surrounding area. This is noted within the submitted plan. So too are OCT's aspirations to promote the conservation of lands and buildings, the protection, preservation and improvement of rural and visual character, and the amenities of the parishes for local public benefit (Paragraph 2.4).

As the name implies, the primary role of the Trust is conservation, with a programme of renovation as and when properties become vacant. This, along with other work of the Trust aims to protect and enhance the character of the area for the benefit of the parish inhabitants. Accordingly, the trustees are discharging their aims and objectives in accordance with the Trust instrument, but in addition, objectives provide for some donations to be made from the Trust to support community clubs and societies, together with other charities. Much of this work would not have been possible without capital being released.

The Trust's land interests have been the subject of promotion as part of the progression of Ombersley and Doverdale Neighbourhood Development Plan and the South Worcestershire Development Plan Review (SWDPR) being progressed by the South Worcestershire Councils.

Five sites were identified and short-listed as being suitable for housing following an assessment by the Neighbourhood Plan's independent planning consultant. A residents' survey and drop-in session then collected data on site preferences. The emerging SWDPR allocation (referenced SWDP NEW 37: *Land off Sandys Road*) was the Neighbourhood Plan's second preference site.

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The submitted Neighbourhood Plan makes no new housing allocations (given Policy TOAD 3 Land north of Woodhall Lane, Ombersley, was an allocation within the SWDP adopted in 2016). Given Ombersley is a highly sustainable settlement with a range of services, consideration should have been made to allocating further suitable land for housing to support the community.

This is discussed in more detail below.

Sustainable Development

The Consultation Statement accompanying the submitted plan outline TOADs response to OCTs belief that further residential allocations should be made in Ombersley.

The overarching vision of Ombersley and Doverdale Neighbourhood Plan is for a vibrant and viable community where progress is welcome which reflects the area's unique heritage and values the Worcestershire countryside. Policy TOAD 1 supports sustainable development, and the document as a whole recognises the wide range of community facilities and services.

Ombersley is a Category 1 Village within the South Worcestershire Settlement Hierarchy, which enables the development of housing sites of appropriate scale to address the housing need. Category 1 settlements are described as those with a good range of services and facilities, and some access to public transport.

Ombersley remains within this category in the emerging SWDP Review, grounded on the results of an updated 2019 Village Facilities and Rural Transport Study. This is based on Ombersley having access to a range of public transport services and community services, including:

- Shops
- A Primary School
- Doctor's Surgery
- Dentist
- Pubs
- Local businesses
- Car garage
- A café
- Village Hall
- Recreation Ground
- Allotments
- Sports Club/team
- Children's play area/park
- Church

To this end, Ombersley is highly capable of supporting housing allocations within the Neighbourhood Plan, particularly given the document aims to plan for a period up to 2030. Additional residents would support the diverse range of local services and could for example help support the introduction or re-introduction of other services such as a Post Office.

Indeed, the Neighbourhood Plan's Housing Site Assessment published in April 2019, written by the group's independent planning consultant DJN Planning Limited, recommended that: "*As a minimum, the NDP [Neighbourhood Development Plan] provides for an additional 42 dwellings over and above existing completions, planning permissions and SWDP site allocations in the period 2016-2041.*"

This indicative housing requirement was calculated using the SWDP methodology endorsed at the Joint Advisory Panel on 26th February 2019. AECOM's draft Ombersley and Doverdale Housing Needs Assessment, dated January 2019, provides evidence of need that would justify seeking to deliver more housing than the requirement as it presently stands.

In response to the Trust's view on this matter, the Consultation Statement accompanying the submitted Plan outlines TOADs response, which reads:

"The adopted SWDP makes allocations of land for housing at Ombersley to address requirements up to 2030 (this is also the end of the NDP period). The current review of the SWDP is considering the issue of allocating further land at Ombersley consistent with its Category 1 status to address requirements up to 2041".

Given this response it appears that there is at least some acceptance from TOAD that further housing allocations being made within the Neighbourhood Plan area are inevitable.

In the context of Ombersley's ability to support development the allocation of housing to the village is supported. It is also noted that South Worcestershire Councils may need to accommodate far greater housing numbers than previously expected given potential changes to the Government's standard methodology to calculate housing need, although it is understood that numbers have not been finalised. Moreover, further numbers could be readily accommodated since development should take place in sustainable locations, in line with adopted national planning policies.

It is appreciated that the SWDP Review had been progressing an allocation alongside similar timescales to the predicted adoption of the Neighbourhood Plan (SWDP NEW 37: *Land off Sandys Road*) but has now been severely delayed.

Given that national guidance makes clear that all housing targets should be considered as a minimum, the sustainability credentials of Ombersley to accommodate more development and the tacit acknowledgment that more housing is needed, it is disappointing that the Ombersley and Doverdale Neighbourhood Plan does not more seriously consider making its own allocation particularly given the abundance of potentially suitable sites.

Housing Mix

Whilst the need to provide a stock of smaller homes is recognised, it is considered unsuitable to place a blanket requirement as per Policy TOAD2 on schemes of five or more units as it stands. This directs that at least 50% of market homes should be provided as one- or two-bedroom properties and approximately 40% as three-bedroom properties, unless up to date evidence on local need or viability suggests otherwise. This new requirement is very heavily skewed towards very small units.

The consultation statement accompanying the submitted plan confirms Wychavon District Council officers objected to this policy at pre-submission draft stage, stating:

"Recognition that the housing mix sought in TOAD2 is justified by local evidence but suggest rewording to state "approximately 50% are 1 or 2 bedrooms, approximately 40% are 3 bedrooms and approximately 10% are 4 and above bedrooms" in order for the policy to not be overly onerous. It should also be noted that the latest SHMA (September 2019) indicates a different market housing mix to that previously, with the greatest need for 3 bedroom dwellings, then equally 2 bedroom and 4 bedroom dwellings, and finally a negative need for 1 bed dwellings. As such, the proposed housing mix sought in TOAD2 may wish to be reconsidered, particularly as developers rarely include 1 bedroom dwellings as market homes as they are generally not easy to sell..."

As also shown in the consultation statement, Savills made a very similar objection TOAD2 and welcome and support Wychavon District Council's own concerns.

It is recognised that SWDP 14 Market Housing Mix requires all new residential developments of five or more units to contain a mix of types and sizes of market housing, as informed by the latest Strategic Housing Market Assessment (SHMA) and other local data including that collected for Neighbourhood Development Plans.

To be precise, the Wychavon SHMA 2019 indicates the likely change in demand for dwelling types and sizes and how this translates to an overall percentage change in dwelling requirement. Analysis indicates that the

majority of need will be for 3- bedroom (42.6%) and 2-bedroom (26.8%) followed by 4 or more-bedroom (19.4%) and 1-bedroom dwellings (11.2%). This evidence, published in September 2019, is more up to date than the Ombersley and Doverdale Housing Needs Assessment (HNA) of February 2019 which seems to form the sole evidence base to Policy TOAD2.

In response to the Council's objection to this policy, TOAD respond:

Noting the dwelling mix indicated at district-level in the latest SHMA, the recommendations of the local [Housing Need Assessment HNA] (February 2019) are based on a parish-level analysis and for this reason are to be preferred. The HNA provides appropriate, proportionate and robust evidence to support the policy approach. It recommends that given the nature of the dwelling stock and demographic trends (and recognising that demand for 3-bed properties will remain significant), building more 1 or 2-bed dwellings will allow older households to downsize and younger households to stay in the area. The policy is not prescriptive as to whether 1- or 2-bed properties are provided, and allows for further evidence on local need or viability to be considered. However, it is agreed that the policy should be amended ... to avoid being overly onerous."

Whilst accepting that the HNA is based on more recent evidence Savills remains concerned by the clear tension between the SHMA findings and TOAD's HNA. As you are aware, it is not particularly realistic to base a target housing mix on evidence at a parish level as it is one snapshot of a small area at one particular time. The SHMA has a much more comprehensive methodology that first defines the housing market area and uses detailed population and employment data to make future projections of likely housing demand for the plan period up to 2030. Savills contends this a much more robust approach particularly as the HNA does not consider how employment growth will affect future demand.

As a national planning consultancy, Savills has a huge amount of experience working with housebuilders of all sizes to deliver development on allocated sites. This experience has shown that a housing mix as currently prescribed by Policy TOAD2 would make a potential development site very unattractive to the vast majority of potential developers. Wychavon District Council's earlier objection makes clear that you have similar experience as to how housebuilders need to react the market and balance current demand against policy.

National guidance makes clear that any housing allocation must be deliverable. As currently drafted, Policy TOAD2 would lead to allocations failing this requirement. The blanket approach required by Policy TOAD2 is counterproductive and unlikely to result in the right type of housing in the right locations. One of the basic conditions of any Neighbourhood Plan is that it is consistent with the Development Plan for the wider planning authority. We remain unconvinced that sufficient evidence has been provided in support of Policy TOAD2 for its demands to meet this basic condition.

We accept that the amended policy allows some variation to that prescribed by Policy TOAD2 if a financial viability case can be made. We remain concerned that this still does not provide the flexibility for potential developers. Viability assessments are costly and time consuming for all parties, requiring expert input from both applicant and decision maker. It would be unusual to use viability assessments in this way, especially on greenfield allocations.

A related concern is that the delivery of one- and two- bedroomed units are typically flatted dwellings. The policy does not allow for a balance of considerations such as appropriate design, village character, and the conservation area. Such a stringent requirement is likely to necessitate a development out of character with the grain of the existing area.

Conclusion

In conclusion, OCT supports the Ombersley and Doverdale Neighbourhood Development Plan, subject to the following matters for further consideration:

- Ombersley is a sustainable Category 1 settlement with a variety of services, facilities and public transport provisions. It is highly capable of accommodating development, which would help to support and retain the level of services within the village.
- The stringent requirement for housing mix is not considered appropriate given other up to date housing need evidence and design requirements and will likely suppress development.

We trust that the above provides a useful contribution to the process, however, should you have any points of clarification or require any further details please do not hesitate to contact me at the above address. The Trust is, as ever, willing to engage further.

Yours faithfully

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Savills