



SWDP Project Manager  
c/o Policy Plans Team,  
Housing and Planning Services,  
Wychavon District Council,  
Civic Centre,  
Queen Elizabeth Drive,  
Pershore,  
WR10 1PT.

SENT BY E-MAIL AND POST

20th November 2015

Dear Sir / Madam

### **SOUTH WORCESTERSHIRE DEVELOPMENT PLAN (SWDP) PROPOSED MODIFICATIONS CONSULTATION**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following representations.

Policy **SWDP13** Bullet Point 12 of supporting text "in preference to greenfield land" should be deleted for consistency with national policy and wording used elsewhere in the South Worcestershire Development Plan.

Under Policy **SWDP3** (MM15/03A) the Councils still persist on the basis of non-transferable housing targets for the four sub areas of the Housing Market Area (HMA) so if the Wider Worcester Area (WWA) does not deliver as predicted alternative sites elsewhere in the HMA are prevented from coming forward for development in order to meet housing needs. The Councils are referred back to previous representations on this matter submitted by HBF and other parties. The HBF remain of the opinion that the Councils solution of monitoring and subsequent review as set out in Policy **SWDP63** is too blunt an instrument to respond effectively and quickly to any identified shortfalls in meeting housing need. Moreover no key performance indicators or specific measurements against which performance is judged are set out.

Whilst proposals for energy generation from renewable / low carbon sources and decentralised energy on larger schemes under Policy **SWDP27** are

subject to viability testing criteria it is suggested that these proposals should be re-checked for consistency with national policy. Policy **SWDP30** on water efficiency proposals should also be checked for compliance with national policy. If found to be inconsistent these policies should be deleted or modified accordingly.

For the SWDP to be found sound under the four tests of soundness as defined by paragraph 182 of the NPPF, the Development Plan should be positively prepared, justified, effective and compliant with national policy. Unfortunately despite proposed modifications the Plan remains unsound. It is not consistent with national policy nor positively prepared or properly justified so it will be ineffective.

It is hoped that these representations are of assistance to the Councils in informing the next stages of the SWDP. In the meantime if any further information or assistance is required please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



**Susan E Green MRTPI**  
**Planning Manager – Local Plans**

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