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Dear Mr Hobbs

**CITY OF WORCESTER LOCAL DEVELOPMENT FRAMEWORK
PREFERRED OPTIONS REPORT: BALANCED HOUSING MARKETS DPD**

Thank you for your letter dated 17 March 2006 inviting comments on the Preferred Options Report for the Balanced Housing Markets DPD.

Firstly, I welcome the fact that the document has been prepared taking into account the comments of the Government Office on the Issues and Options Report. I note that you have also responded to the views expressed during community engagement and consultations during the Issues and Options stage.

The representations of the Government Office on the Preferred Options Report are based primarily on the Tests of Soundness for DPDs. There are also some other more detailed comments. In considering the document regard has also been taken of the checklist for Prepared Options Reports contained in the guidance, "Creating LDFs" (November 2004). All the points made are aimed to assist you in preparing the DPD for submission to the Secretary of State.

Policy Aims

The Report clearly sets out the Policy aims which have taken into account national, regional and local policies. However, there is no statement of a spatial vision which should be included in the DPD.

Test One

It is noted that the document has been brought forward in accordance with the effective Local Development Scheme. The Report is another stage in the preparation of a DPD which is "to address the requirement for a balanced housing

market". The LDS refers to the inclusion of proposals for house types and sizes (including open market). In paragraphs 4.35 and 4.45 of the Report, the issue is addressed but there are no policies emerging. Is it the authority's intention to include a policy in the submission DPD?

Test Two

The inclusion of a summary of responses and representations on the Issues and Options as Appendices has been helpful, together with references in the text which show how changes have been made in response to community engagement.

Test Three

It is noted that a Sustainability Appraisal has been carried out and included as an Appendix to the Report. It is also noted that a Scoping Report has been prepared and has been the subject of consultations.

Test Four

The preferred options, in terms of both the draft policies and the statements regarding the proposed policy direction, are consistent with national policy, particularly in terms of the priority given to previously developed (brownfield) land.

The account which is being taken of the Government's policy on housing as set out in draft PPS3, Housing (December 2005) is welcomed.

There is, however, one issue which you will need to address in the Submission DPD, namely the provision of sites for gypsy and traveller caravans. Current Government advice is set out in Circular 1/2006 "Planning for Gypsy and Traveller Caravan Sites" (February 2006). Local authorities should include allocations for sites, based on evidence of need, in one of the DPDs which form part of the LDF. As this DPD is dealing with balanced housing markets, the phasing of housing sites, and gypsies and travellers, you should consider identifying sites for this purpose. This is important because you do not have a Site Allocations DPD programmed in your current LDS.

There are concerns that, notwithstanding some of the comments made at the Issues and Options stage, the DPD is too narrowly focused on land use issues and is not fully taking the spatial approach required under the new development plan system. The relationship with housing strategy, and other policies relevant to the improvement or management of the existing housing stock to provide a balanced housing market, is not fully taken into account.

Test Five

It is noted that account has been taken of the Community Strategy and that the DPD is being prepared in order to be in general conformity with the Regional Spatial Strategy.

Test Six

The sites referred to in the Report have previously been identified and tested through the preparation and adoption of the Local Plan. Given the relationship with the Local Plan, the approach you have taken in identifying detailed policies in appropriate cases and setting out general policy directions is appropriate.

Test Seven

The Preferred Options appear to be based on evidence, for example the Housing Requirements Study. It would however be beneficial to have clear referencing to the evidence base. There should also be a clear statement on how decisions were made on options in order to establish the preferred option. In particular, in paragraph 4.21 you refer to "several options, including" and then outline four. If other options have been considered and rejected you should state what they were and the reasons for rejecting them.

On the matter of policy development, there are several issues where it is not clear whether policies will be included in the submission DPD. In particular I refer to tenure, mentioned earlier, increased provision of affordable housing on allocated sites and housing for the Black and Minority Ethnic population.

The policies to increase generally affordable housing provision are welcomed.

Test Eight

Reference is made to the implementation and monitoring of policies and, if necessary, the need to amend policy. This approach is welcomed. However, there is a need to identify targets and milestones against which monitoring can take place. Given the subject matter of the DPD, it will be important to establish a housing trajectory in the submission document. Annex B of PPS12 provides guidance on housing trajectories. You will recall that monitoring the housing trajectory is also one of the Core Output Indicators in the Annual Monitoring Report.

Delivery mechanisms and a statement of who is to implement the policy should be concluded.

Test Nine

The Report indicates that a flexible approach will be taken and that policies will be changed should the need be identified through monitoring. This approach is welcomed.

Should you need to clarify any of the issues raised in this letter, please do not hesitate to contact me.

Yours sincerely

MIKE PRICE
Senior Planning Officer
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