



**Local Plan Review**

# **Publication Plan**

## **Housing Density**

### **Topic Paper**

**November 2022**

## Introduction

Increasingly, national policy and unmet housing needs in the District and surrounding housing market area are driving the need for more housing land to be released in the District, so that the housing required to meet local and regional needs can be provided. This means it is increasingly important to consider policies which optimise the amount of housing that can be delivered on sites within the District, in a manner which is appropriate to the local circumstances of housing sites in South Staffordshire.

To develop an approach to density in the Local Plan review, a number of key elements of national planning policy, regional and local evidence base documents and best practice guidance have been considered. Key findings from each of these sources are summarised below. These are then used to inform a future density policy for the Local Plan review, which is set out in draft in Section 6.

### 1. National policy and guidance

#### National Planning Policy Framework (NPPF) 2019

1.1 Paragraph 122 requires decisions and policies to make efficient use of land, taking into account:

- the identified need for different type of housing and other forms of development, and the availability of land suitable for accommodating it;
- local market conditions and viability
- the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable transport modes that limit future car use
- the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change: and
- the importance of securing well-designed, attractive and healthy places.

1.2 Paragraph 123 requires areas with an existing or anticipated shortage of land to meeting identified housing needs to avoid building homes at low densities and to ensure development optimises the potential of each site. As part of this, plans should include minimum density standards for locations well served by public transport and should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate. Minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range.

- 1.3 Paragraph 137 covers Green Belt exceptional circumstances and makes clear that any strategy releasing Green Belt should optimise densities in a manner consistent with Section 11 of the NPPF (i.e. paragraphs 122 and 123).

Planning Practice Guidance (PPG)

- 1.4 Planning Practice Guidance on making effective use of land indicates that a range of tools may assist in establishing appropriate densities on a site or in a particular area, including accessibility to key facilities, characterisation studies and design strategies, environmental and infrastructure capacity assessments and market or site viability<sup>1</sup>. In addition to this, the Government's National Design Guide (which supports the advice in Planning Practice Guidance) indicates that "*well designed places do not need to copy their surroundings in every way. It is appropriate to ... include innovation or change such as increased densities, and to incorporate new sustainable features or systems*".

**Key facts**

- There is a general requirement in the NPPF and PPG to make effective use of land, having regard to access to key services and facilities, an area's character, environmental infrastructure and capacity and viability
- Government design guidance indicates that well designed places do not need to copy their surroundings in every way, and that it is appropriate to plan for increased densities
- The NPPF highlights the need to consider minimum density policies in areas where there is a housing shortfall in order to achieve a "*significant uplift*" in housing densities, particularly (but not only) in areas well served by public transport

**2. Greater Birmingham HMA Strategic Growth Study 2018**

- 2.1 In order to reduce the extent of Green Belt and countryside release required to meet the substantial housing shortfalls of the Greater Birmingham Housing Market Area (GBHMA), this study concluded that it would be reasonable to apply a minimum density of 35 dwellings per hectare to land supply in the GBHMA authorities surrounding the urban conurbation, with conurbation areas (Birmingham and the Black Country) achieving 40 dwellings per hectare<sup>2</sup>. The study concluded that applying these minimum densities to existing land supply could realise an additional capacity of around 13,000 dwellings across the GBHMA<sup>3</sup>, reducing the pressure for Green Belt land take.

<sup>1</sup> Planning Practice Guidance: 'Effective Use of Land' paragraph 004

<sup>2</sup> Paragraph 1.33 of the Greater Birmingham HMA Strategic Growth Study 2018

<sup>3</sup> Table 38 of the Greater Birmingham HMA Strategic Growth Study 2018

- 2.2 Given the potential role density increases could play in minimising further Green Belt loss to address the housing shortfall, it is important to ensure these recommendations are fully tested. For example, the Black Country authorities' 2018 Urban Capacity Review<sup>4</sup> establishes that the emerging Black Country Plan will seek an uplift in minimum densities from 35 to 40 dwellings per hectare, in order to minimise Green Belt release and to deliver the recommendations of the Greater Birmingham HMA Strategic Growth Study 2018. This may be relevant to any sites allocated in South Staffordshire which are, in effect, urban extensions to the built form of the Black Country urban area.

### **Key facts**

- To reduce the need for Green Belt release within the District and the wider housing market area developments within South Staffordshire should seek to achieve a minimum density of 35 dwellings per hectare and developments within the Black Country should seek to achieve a minimum density of 40 dwellings per hectare
- The Black Country are already considering an uplift to 40 dwellings per hectare through the emerging Black Country Plan, which may be relevant to the District given the number of potential land options adjacent to the Black Country in South Staffordshire

## **3. Historic assumptions regarding density in and adjacent to South Staffordshire**

- 3.1 South Staffordshire's Strategic Housing and Economic Land Availability Assessment (SHELAA) 2018 established appropriate District-wide site assumptions in respect of site densities, based on different broad locations within the District. These were established for the purpose of assessing both existing housing site options and the minimum capacity of potential future housing site options within the District through the Local Plan review, as set out below:

- *Village edge/isolated greenfield sites*: 32 dwellings per hectare
- *Sites within existing village envelope/brownfield sites*: 38 dwellings per hectare
- *Sites on the edge of an adjacent urban area*: 35 dwellings per hectare

- 3.2 These assumptions drew on evidence of historic average densities within the District between 2007-2017 and were agreed as realistic starting points for estimating site yields with members of the District's SHELAA Housing Panel, which included local land agents, housing developers and neighbouring local authorities. Therefore, they offer some indication as to the minimum average densities achieved in the District

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<sup>4</sup> Available here: <https://blackcountrycorestrategy.dudley.gov.uk/media/11522/urban-capacity-report-may2018.pdf>

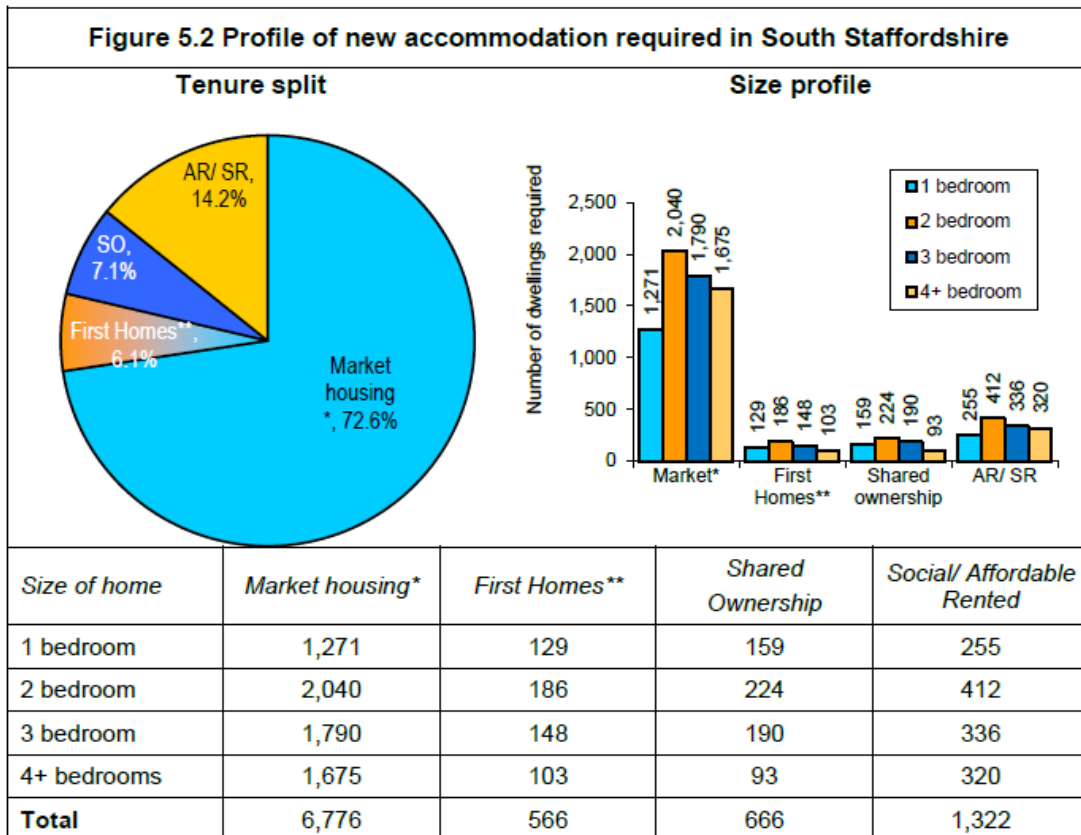
historically. However, the data which informed these judgements dated from before the introduction of the NPPF 2019 and its associated requirements for significant uplifts in densities to be delivered where housing shortfalls exist.

**Key facts**

- Prior to the introduction of the NPPF 2019 and its requirement for density uplifts, average densities within the District have exceeded 30 dwellings per hectare
- 32 dwellings per hectare was considered a realistic historic average estimate of minimum site yield on village edge sites
- 35 dwellings per hectare was considered a realistic historic average estimate of minimum site yield on urban edge sites historically

**4. Future housing mix requirements that may impact on density**

4.1 The Council has prepared a Strategic Housing Market Assessment 2022 (the SHMA), which examines the need for different types and forms of housing. This provides important evidence on the size of dwellings the Council is likely to need in future years. Key findings from the SHMA are presented below



\*Market housing includes both owner-occupied and private rented \*\*First Homes figures represent potential demand rather than a requirement. These figures represent the distribution of housing that should be delivered.

- 4.2 Key findings relevant to the density of future development are as set out below;
- The greatest needs across the District are for 2 and 3 bedroom dwellings
  - A significant need for 1 bedroom dwellings also exists, representing around 20% of total needs
  - The majority of future dwellings will meet the needs of owner occupiers, but a significant proportion of rented properties are also required
- 4.3 These findings are consistent with the Council’s historic policies on housing mix, which reflected the need to provide more 2 and 3 bedroom properties in the District. This reflects the need to rebalance the District’s housing stock, 70% of which is currently 3 bedrooms or more, meaning that future housing densities and layouts will inevitably need to consider higher housing densities to redress this imbalance and provide more 2 bedroom properties in particular. Furthermore, the evidence from the SHMA set out above indicates that there is also a significant need for 1 bedroom properties and private rented accommodation, indicating a need that may (in some cases) be best met through provision of flats.
- 4.4 To further examine how its housing mix policies have been delivered on the ground alongside other policies that may impact on density<sup>5</sup>, the Council has assessed recent full planning permissions/applications for housing development. Permissions and applications have been considered where these are promoted by a housing developer (as opposed to a land agent) and have been determined or prepared since the production of the Council’s latest housing mix evidence (the 2017 Strategic Housing Market Assessment) and 2018 Housing Strategy. This ensures that these applications reflect both the latest evidence and policies regarding housing mix, internal and external space and green infrastructure, whilst also providing a viable product for developers. Specifically, these applications would have achieved a satisfactory mix of property sizes for both market and affordable properties (in line with the 2017 SHMA evidence), whilst delivering 10% of the overall dwelling mix as housing suited to more elderly residents<sup>6</sup> (in line with the 2018 Housing Strategy). The planning applications and permissions which meet these criteria are listed in Appendix 1.
- 4.5 In summary, key findings of recent planning permissions are:
- Larger village-edge sites have usually delivered above 35 dwellings per hectare
  - Smaller village-edge sites have delivered between 30 and 35 dwellings per hectare
  - Infill sites for housing within the villages have usually delivered above 35 dwellings per hectare

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<sup>5</sup> For example, parking standards or space about dwellings requirements

<sup>6</sup> Meaning either bungalows, 1.5 storey dormer bungalows or ground floor flats

- The elderly persons' flatted scheme permitted during this time period delivered in excess of 80 dwellings per hectare.

### **Key facts**

- Since the publication of the District's latest housing mix evidence, larger village edge sites have delivered over 35 dwellings per hectare whilst meeting other local policies
- Over a similar period smaller village edge sites have delivered between 30 and 35 dwellings per hectare
- Inclusion of apartments designed to meet the District's elderly persons needs into wider scheme design is likely to increase densities further

## **5. Densities required to support infrastructure**

- 5.1 Ensuring future housing growth provides for and sustains infrastructure is a key priority for the Council in its Local Plan review, emphasising the importance of new development providing more than just housing. Furthermore, as set out above, the NPPF encourages the efficient use of land, particularly where there is a high level of access to public transport and mixed use areas. It is therefore important to examine whether increased densities could play a role in delivering and sustaining facilities within the District.
- 5.2 Numerous publications draw a link between the density and catchment of surrounding residential development and the viability of nearby public transport. For example, the Urban Design Compendium suggests that around 45 dwellings per hectare should be planned around bus stops to sustain a good bus service. A similar finding is echoed in the withdrawn Better Places to Live: By Design, which recommends that 40 dwellings per hectare is planned to facilitate regular bus stops every 200-300 metres, with higher densities around the bus stops themselves. Equally, a number of documents<sup>7</sup> indicate that higher densities are likely to be most effective within walking distance of a regular bus route, which is usually indicated as being between 400-800 metres. However, it is important to note that the overall convenience of access to bus use is important and will influence whether or not a service will be used regularly, so the attractiveness of individual stops (and therefore whether or not people will walk to them) will vary depending on individual circumstances<sup>8</sup>.
- 5.3 Both the Manual for Streets and the Urban Design Compendium suggest certain population thresholds are required to support local shops and other centre uses. Both suggest that a critical population mass to support services is best met within a walking

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<sup>7</sup> See, for example, 'How far do people walk?' – WYG (2015), 'Planning for Walking' – CIHT (2015) and 'Bus Services & New Residential Developments: General Highways and Urban Design advice to applicants and Highways Authorities' – Stagecoach (2015)

<sup>8</sup> 'How far do people walk?' – WYG (2015)

threshold of approximately 800m in order to deliver walkable neighbourhoods. This 800m threshold is also supported by the government's latest National Design Guide. Although this threshold is not an upper limit on the distance people will walk to services, it still supports the idea that optimising densities within walkable neighbourhoods can help to ensure that residents are likely to walk to local shops rather than drive, thus reducing pressure on parking and highways and supporting nearby local services.

### **Key facts**

- Higher densities may be most appropriate where these help to deliver walkable neighbourhoods which support local services and public transport, reducing the degree to which residents will use cars for their day to day needs
- Indicative thresholds indicate users will typically walk between 400-800m to access a bus stop and 800m to access local services
- Setting a strict threshold within which higher densities should be delivered may not be appropriate, as site specific factors and the frequency and reliability of a service will influence whether or not residents are likely to walk longer or shorter distances on the ground

## **6. Conclusions on density evidence and recommendations**

- 6.1 There is clear evidence from the above that schemes across South Staffordshire can consistently achieve densities above 30 dwellings per net developable hectare, even prior to the NPPF 2019's requirement for significant density uplifts to be delivered. There are also significant benefits to optimising densities in appropriate locations, particularly where these may help to support local services and facilities and reduce the likelihood of residents travelling by car to meet their day to day needs. Furthermore, there is a clear need for densities to be optimised as far as possible, both in the District and the wider market area, in order to reduce the extent of Green Belt land which must be released to meet housing needs in sustainable locations.
- 6.2 Taking into account these summary findings and the evidence set out above, a range of density approaches can be derived for different broad locations within the District. These are set out below.

***Density range category 1: Sites on the edge of the District's Tier 1 villages, infill sites within existing village envelopes and urban extensions to neighbouring towns and cities bordering the District***

- 6.3 Whilst the SHELAA 2018 indicated that 32 dwellings per hectare was typically what was historically achieved on the edge of villages (without differentiating by site size), the NPPF 2019 indicates that a significant uplift in density should be sought in areas better served by public transport. Importantly, the District's Tier 1 settlements are



often larger than other Tier 2-4 settlements, typically containing a wider variety of services and facilities, including the only rail services available within the District. Furthermore, more recent planning permissions on larger sites delivered in Tier 1 and 2 villages indicate sites which deliver the housing mix requirements of the 2017 SHMA and Housing Strategy 2018 have been in excess of 35 dwellings per hectare. Similar evidence is available for infill sites within the District's rural villages, where both recent permissions on infill sites and the agreed density assumptions in the SHELAA 2018 indicate that sites can be expected to achieve densities of 37-38 dwellings per hectare. The Greater Birmingham HMA Strategic Growth Study also indicates that HMA authorities surrounding the urban conurbation should achieve 35 dwellings per hectare as a minimum density to minimise further Green Belt loss.

- 6.4 All of these factors indicate there is scope to uplift in densities in the District's Tier 1 settlements and on infill sites within other settlements across the District. Therefore, on balance, sites adjacent to Tier 1 settlements and infill sites within any existing village development boundaries can typically be expected to be capable of achieving **densities in excess of 35 dwellings per net developable hectare** whilst complying with the relevant housing mix evidence and NPPF 2019 policies.
- 6.5 The existing SHELAA 2018 indicates that neighbouring authorities and other stakeholders considered that larger housing sites on the edges of adjacent urban areas will typically achieve minimum densities of 35 dwellings per hectare, which was established prior to the NPPF 2019 requirement for density uplifts to be considered. Since this work was carried out, the Greater Birmingham HMA Strategic Growth Study has recommended that a minimum density of 40 dwellings per hectare is achieved on land within the Black Country conurbation in order to reduce the extent of Green Belt release required elsewhere within the Greater Birmingham HMA. Current evidence indicates that this recommendation is being committed to through the emerging Black Country Plan, and so it may also highlight an important opportunity to optimise densities on any urban extensions allocated adjacent to the Black Country within South Staffordshire.
- 6.6 It is also important to note that urban extensions to neighbouring towns and cities will likely be larger than many of the sites allocated in the District's smaller settlements, there is more scope for a range of character areas to be realised within a site's built extent, offering greater opportunities for densities to be optimised (e.g. through use of apartments). Furthermore, they will often lie in closer proximity to facilities in the adjacent urban area, or (in some cases) may offer opportunities to deliver new mixed-use centres and public transport provision due to their scale. Both of these factors further support the scope for a greater minimum density to be realised on such sites.
- 6.7 Having regard to the above, sites allocated adjacent to neighbouring towns and cities bordering the District can be expected to be capable of achieving **densities in excess**

**of 35 dwellings per net developable hectare** whilst complying with the relevant housing mix evidence and NPPF 2019 policies.

**Density range category 2: Sites on the edge of the District's Tier 2-4 settlements**

- 6.8 The existing SHELAA 2018 indicates that historically sites on the edge of villages have delivered 32 dwellings per hectare on average. Whilst more recent larger schemes have exceeded this amount significantly, the same cannot be said for recent smaller housing schemes (less than 100 dwellings) adjacent to Tier 2 and 3 settlements, which have achieved a density range of 32-35 dwellings per hectare. In officer's experience, this is typically because the scale and shape of such sites may reduce opportunities to intermix higher density dwellings within the overall scheme layout whilst respecting the interrelationship between the scheme and the surrounding countryside that forms an important part of the setting of such villages.
- 6.9 In addition to the above, the infrastructure capacity and accessibility of key services is usually more constrained in the District's Tier 2-4 settlements. This is because their designation as Tier 2-4 settlements reflects evidence that suggests that they generally have less favourable level of service and facility provision than the District's Tier 1 settlements<sup>9</sup>. However, there are still areas across Tier 2-4 settlements which sit in close proximity to a relatively wide range of local amenities and/or regular bus routes. The District's housing mix evidence also encourages the provision of smaller properties across the District, which applies equally to Tier 2-4 villages.
- 6.10 Despite the historic difficulties in achieving 35 dwellings per hectare in such settlements, there is still an increased emphasis in the NPPF 2019 on the importance of not permitting schemes which do not make efficient use of land and to consider the use of minimum densities across all parts of the plan area. Furthermore, inefficient use of land in Tier 2-4 villages will inevitably increase the amount of Green Belt land required elsewhere, a fact recognised in the Greater Birmingham HMA Strategic Growth Study, which recommended a minimum of 35 dwellings per hectare to be achieved on future land supply for this reason.
- 6.11 Having regard to all of the factors set out above, it is considered that it is still important to optimise densities within the District's Tier 2-4 settlements whilst complying with the relevant housing mix evidence and NPPF 2019 policies. Therefore, whilst not all Tier 2-4 settlements may be appropriate for the minimum densities applied to Tier 1 settlements, there may still be a case for delivering higher densities within Tier 2-4 settlements on a site by site basis. As such, no blanket minimum density requirement will be set, but policies will require applications to demonstrate

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<sup>9</sup> South Staffordshire Rural Services and Facilities Audit 2019

how they have optimised densities on any sites, whilst complying with the District's other design requirements.

## 7. Policy recommendations

- 7.1 To deliver the recommended minimum density ranges set out above, the Council is proposing to introduce a housing density policy in the Local Plan review. This will help to ensure efficient use is made of land in appropriate locations, whilst providing clarity to developers as to the Council's expectations in future housing developments. The draft policy is set out below:

### **Policy HC2: Housing Density**

Housing developments, including rural exception sites, will achieve a minimum net density of 35 dwellings per net developable hectare in developments within or adjoining Tier 1 settlements, in infill locations within the development boundaries of other settlements in the district or in urban extensions to neighbouring towns and cities. Where it would help to support the delivery of local services and facilities, sites will be encouraged to exceed this minimum density standard where this could be done in a manner consistent with other development plan policies, particularly those relevant to the character of the surrounding area.

The net density on a site may go below the minimum density standard set above if to do otherwise would result in significant adverse impacts to the surrounding area's historic environment, settlement pattern or landscape character.

All housing developments should make efficient use of land, whilst ensuring they still meet the requirements of other local plan policies. In areas not covered by the minimum density standards set out above, the appropriate density of a scheme will be determined on a case-by-case basis. In doing so it will have regard to the location of the site relative to services and facilities and other development plan policies, such as those addressing local design, character and housing mix requirements. Housing applications will be refused where they fail to demonstrate how they have optimised a site's density in accordance with these principles.

Development proposals should be consistent with other Local Plan policies.

## Appendix 1 – Summary of net densities on recently permitted housing schemes

Major housing schemes for full/reserved matters permission since the latest housing mix evidence (SHMA 2017) and Housing Strategy (March 2018)					
Site type	Planning reference no.	Dwellings	Developable area (ha)	Dwellings per developable ha	Notes
<b>LARGE VILLAGE EDGE</b>					
Land off Pendeford Mill Lane, Bilbrook	18/00710/FUL	164	4.38	37	
Hobnock Road, Essington	18/00450/REM	230	6.29	37	
Land north of Bridgnorth Road, Wombourne	18/00802/FUL	102	2.76	37	
<b>SMALLER VILLAGE EDGE</b>					
Land off Engleton Lane, Brewood	18/00991/FUL*	73	2.26	32	* Application is currently being considered, but is anticipated to be determined in 2019
Land west School Lane, Coven	18/00558/FUL	63	1.8- 2.1**	30-35**	**Developable area depends on whether or not residential access road and landscape buffer to north of the site are included
Wheaton Aston - St Philips	18/00392/REM	30	0.91	33	
<b>VILLAGE INFILL SITES (HOUSING)</b>					
Land off Histons Hill, Codsall	18/00544/FUL	29	0.79	37	
Land off Ounsdale Road, Wombourne	18/00831/FUL*	32	0.84	38	* Application is currently being considered, but is anticipated to be determined in 2019
<b>VILLAGE INFILL SITES (APARTMENTS)</b>					
The Burgesses, Kinver	18/00332/FUL	20	0.24	83	