

Bromsgrove District Council

Affordable Housing Supplementary Planning Document Consultation Statement



NOVEMBER 2009



Planning and
Environment Services

Bromsgrove District Council
www.bromsgrove.gov.uk

Introduction

Under the Planning and Compulsory Purchase Act 2004, it is a requirement for local authorities to engage in community and stakeholder involvement in early stages of plan preparation. Part of this requirement is the publication of this consultation statement alongside both the draft and the adoption versions of any SPDs.

This statement sets all the elements of community involvement that has been undertaken to inform the preparation of the draft affordable housing SPD. As required under the act the consultation that has taken place complies with the Town and Country Planning (Local Development)(England) Regulations 2004, and Bromsgrove District Council Statement of Community Involvement (September 2006).

Formal Consultation

The 8-week period of formal consultation on the draft affordable housing SPD will take place between 30th November 2009 and 30th January 2010.

The document will be available to view in the council office, the customer service centre, and all the District libraries as well as on the Councils website at **www.bromsgrove.gov.uk/planningpolicy**. An advert has been placed in the local press, and all those who have requested to be informed of the formal consultation period have been notified individually by letter.

Pre Production Consultation

The front-loading process introduced in the Planning and Compulsory Purchase Act 2004, is designed to enable Local authorities make key decisions early on in the plan preparation process, in order that wholesale changes are not made at a later stage. The ability to make these decisions is informed by early consultation with the local community and stakeholders.

Consultation first took place in 2005 and has continued in various forms into 2009. This extended period of consultation is unusual for an SPD but due to a moratorium on new housing there was not a pressing need to progress the SPD earlier.

The consultation events used in the preparation of this SPD are as follows,

- SCI / Local Planning workshop event,
- Planning officers facilitating at housing strategy consultation event,
- Focus groups on issues and options for the core strategy,
- Leaflets and subsequent responses generated as part of the informal consultation on issues and options for the core strategy,
- Planning, housing, and environmental health officers working groups on affordable housing and housing strategy,
- Publication of an Information leaflet and questionnaire concerning the issues of both Affordable and Managing housing.
- Wide consultation on Draft Core Strategy, including 'Core Strategy Open Day'

As demonstrated above the consultation undertaken has been in a number of different forms with a wide range of interest groups, the following sections contain details of all the events which have taken place along with a summary of any issues raised.

Consultation Method 1 SCI/Local Planning Workshop

Description

This event took place on the 3rd March 2005; it was designed to launch the LDF process and more specifically the Statement of Community Involvement. As part of this event workshops were held not only on community involvement, but also more general planning issues.

One of the workshops was entitled Housing for everyone, the group was asked to think about

- The balance between protecting the Green Belt and developing housing in the district
- Is the issue of creating more affordable housing more important than the Green Belt?
- What kind of housing is there a demand for in the district?
- Where is there a need for new housing?
- Are there specific housing types needed, e.g. sheltered accommodation for the elderly, bungalows, flats, five bed detached family houses?
- Physical planning methods were used whereby people could raise issues they felt were not covered in the structured event or issues that were of a more locational specific nature.

Summary of Responses

The need for flats for single people, family homes and sheltered accommodation was expressed, as well as people wanting to see mixed housing developments that included some affordable housing. It was noted that the lack of affordable housing in rural areas was forcing young people to leave and communities to be destroyed. It was also felt that new developments should be about building communities not just houses. It was also suggested that more brownfield sites are used in new housing developments to help retain the Green Belt.

Consultation Method 2 Housing Strategy Consultation Event

Description

The Strategic housing section, were responsible for this event, with planning officers responsible for facilitating in workshops on choices in affordable housing, and meeting housing needs. Although these workshops were primarily concerned with the functions of the strategic housing section, there was an element of cross over with issues being raised that are relevant to this SPD.

Summary of Responses

- The lack of supply of affordable housing across all tenures
- The need for closer partnership working between RSLs and the Local Authority on strategic issues

Consultation Method 3

Focus Groups on Issues and Options for Core Strategy

Description

As part of the frontloading process for the core strategy a number of focus groups were organised based around the themes identified in the core strategy issues and options paper. Key issue B in the Issues and options paper was entitled - Housing for everyone, these meetings were open to everyone and held both during the day and in the evening after normal working hours in order that the most number of people were catered for.

Summary of Responses

Viewpoints expressed at these meetings included:

- Bromsgrove needs affordable smaller properties for first time buyers.
- Problems acquiring land in rural areas for affordable housing.
- Need for smaller housing to meet local needs.
- Affordable housing developments need access to facilities and public transport, develop on council owned brownfield sites.
- Larger site can deliver affordable housing through agreements with the developer.
- Seek a mixture of tenure on all affordable housing sites.
- Control how private market housing is sold so it only goes to those with local needs.
- General demographics and family structure are changing, therefore housing being provided needs to change accordingly.
- Villages in the district are losing their young people due to lack of affordable housing in those areas. Young people want to stay in these areas but very often it is not an option for them.
- Smaller dwellings need to be provided in order to give young people a better chance of accessing them. It was recognised a mix of young and old people were needed in each area.
- The ageing population needs to be catered for, specialist housing for the elderly must be provided to meet this need i.e. sheltered accommodation and housing could be converted to meet the needs of older people.
- The local authority need to work with the developer from an early stage in order to make sure the right kind of housing is provided.
- The importance of housing needs assessment was stressed so we can meet the needs of the future.
- There is a lack of affordable housing in villages it was felt provision should be based on local needs.
- Older people need to be encouraged to move out of large family homes, in order to free up more properties for families who need them.
- The possibility of changes to Section 106 agreements was considered, making developers provide a higher percentage of affordable housing in developments.
- Support for lifting the moratorium if it would enable more affordable housing development.

Consultation Method 4 Informal Consultation on Issues and Options for the Core Strategy

Description

The issues and options draft for the core strategy was published in July 2005, to accompany this document separate leaflets were produced covering each of the ten sections, these leaflets gave the public a chance to respond to individual issues which concerned them rather than have to respond to the whole document. Below is a summary of the responses received for the Key issue B - Housing For Everyone, also included are any points expressed in response to any of the other issues which are related to the Affordable Housing SPD.

Summary of Responses

The leaflet contained four issues concerning housing, with each issue having a further three options whereby people could choose a preferred option. Issues 1, 2, and 3, were of most relevance to affordable housing.

Issue 1 - Type of housing

In future what type of housing will be required in Bromsgrove?

Option 3 proved to be the most popular which stated, ensure all schemes have a needs assessment for the type of dwelling being proposed but against clear guidelines

Issue 2 - Provision of affordable Housing

How should we ensure further affordable housing provision?

Option 2 was the preferred option, which stated, Allow limited general housing on Brownfield sites with a high level of affordable housing provision, ensuring mixed developments.

Issue 3 - Location of Affordable Housing

The Preferred option (option 3) was to see new affordable housing spread out across the district.

As well as being asked to pick a preferred option comments were also invited on any other aspects of housing in the district, those relevant have been summarised below.

- A housing needs assessment should be undertaken to ascertain what housing is required in the district.
- Green belt land adjacent to villages and Bromsgrove Town seems a useful way of ensuring affordable housing development, and would support rural services and schools.
- A range of housing should be provided throughout the district, with provision for those in need of special needs housing.
- ADR land could be used to provide schemes that have an element of affordable housing within them.
- Affordable housing should be supported by market housing in the context of mixed communities.
- It is important to maintain a supply of open market housing in order to maintain the supply of affordable housing.
- The location of affordable housing should be subject to the same tests as open market housing.

Consultation Method 5 Officers Working Groups on Housing Issues

Description

These meetings were attended by members of various council departments and local groups, including Planning Policy, Housing Strategy, Registered Social Landlords, and Environmental Health, these sessions were used to discuss the early formulation of the affordable housing SPD as well as the housing strategy with discussions on items such as rural exception housing lettings criteria

Consultation Method 6

Information leaflet and questionnaire on housing in Bromsgrove

Description

This informal consultation exercise was undertaken in August/September 2005 and consisted of sending out a leaflet and questionnaire to over 200 people/organisations, including all Councillors, Parish councils, adjoining authorities, planning consultants, registered social landlords, and all those who responded to formal consultation on the current SPG10 - Managing Housing Supply in the District of Bromsgrove. The questionnaire was designed to collect views on both affordable housing and managing housing supply. A total of 56 responses were received the results of which are outlined briefly below

Summary of Responses

Q1. Should we continue restricting new housing development?

The majority of responses support continued housing restrictions, although with more exceptions than current policy allows.

Q2. The current Housing SPG has four exceptions from the new policy, should we remove any of these exceptions from the new policy, if so which ones and why?

The largest response was for the retention of the current exceptions, although 20% of people thought renewals of existing permission should be removed from the new policy.

Q3. Would you like to see more exceptions to current policy?

An overwhelming majority of people would welcome more exceptions, with living over the shop schemes the most popular, followed by converting empty properties, conversion of agricultural buildings, and mixed use schemes.

Q4. What size of home would you like to see built in the District?

The response to this question was varied with 1 - 2 bed flats proving to be slightly more popular than the alternatives offered.

Q5. What size of sites should be exceptions to the Managing Housing policy?

The largest response for this question was for small sites 0 - 5 dwellings to be exempt from the managing housing policy.

Q6. Please rank the following location in the order where you would like to see new affordable housing built?

Bromsgrove Town was the most popular location for new affordable housing development, with rural areas proving to be the least popular.

Q7. Should a site's suitability for affordable housing be based on the number of dwellings or the site area?

Site area was preferred over number of dwellings when choosing sites for affordable housing, although in many cases people chose both, and identified that many other considerations should be taken into account when choosing new sites.

Consultation Method 6 *continued* **Information leaflet and questionnaire on housing in Bromsgrove**

Summary of Responses

Q8. What size of sites should we be requesting an element of affordable housing from?

There were mixed views regarding this question with the largest responses received for all sites to provide an element of affordable housing or only the largest sites, with site sizes in between gaining a smaller share.

Q9. What type of affordable housing should be provided?

All three types of affordable housing got a significant share of the response with shared ownership schemes proving to be slightly more popular.

Q10. What levels of affordable housing should we be providing on new housing sites?

The majority of responses indicated we should be looking to make sure up to 30% of dwellings on new housing sites are affordable, with reduced numbers of people wanting to see higher percentages of affordable dwellings.

Q11. Should we be relaxing the policy on planning obligations on affordable housing developments if it makes them more viable?

A large majority of people thought we should be relaxing policy on planning obligations in order to make affordable housing schemes more viable

Consultation Method 6 *continued*

Information leaflet and questionnaire on housing in Bromsgrove

Further Comments on Leaflet

The range of additional comments received varied considerably, some were concerning one individual question others were lengthy and detailed concerning a number of issues, below is a list of some of the summarised key points raised, although it must be noted this is not an exhaustive list of all the points made.

- Provide mixed communities, not ghettos
- Maintain character of the district / Rural areas should be kept rural
- Village envelopes should be enlarged, and provide homes for young people in the villages
- Living over the shop revitalises town centres
- Special needs housing should be provided
- Infrastructure should be provided for any new schemes
- Needs to be a range of different size houses built
- Not all single people want to live in 1 - 2 bed properties
- Development should be planned comprehensively and not allow windfalls through at two and three a time.
- The level of affordable housing development needs to reflect an up to date needs assessment and should take into account specific locations.
- Relaxing planning obligations would need to be assessed on a site by site basis
- The current policy lacks flexibility, and does not allow for the redevelopment of genuine Brownfield sites, where existing property has fallen into disrepair or is unviable in economic terms to continue its use.
- Listed buildings and buildings with architectural merit are not considered, there may be cases where the only way to retain these buildings is to allow for residential conversion.
- The current moratorium has stopped the supply of affordable housing through cross subsidy, leaving the only route being through grants from the housing corporation.
- Planning must consider the economic realities of providing affordable housing. The moratorium needs to be lifted to allow cross subsidy and all sites need to be a mix of private for sale, affordable, shared equity, and social rented.
- This consultation gives the impression that the council is able to control the housing market. Whilst it may be able to control the granting of planning permission for new housing, it has no control whatsoever over the operation of the existing housing supply which accounts for the vast majority of transactions, Those who chose to and can afford to live in the district will still do so by buying into the existing housing market.
- If the council continues to restrict the supply of land for new houses, the combination of that restriction and the normal operation of the market within the existing housing stock will inevitably lead to rises in house prices and consequent problems of affordability.

Summary

The responses received in general were useful and informed, although some appeared to be contradictory in some of their answers to various questions. A number of responses simply used the leaflet and questionnaire as the basis for a much lengthier and detailed response which addressed issues touched on in the literature provided but didn't answer specifically the questions that were asked. This and also the nature of some of the questions were perhaps responsible for the number of questions that were left out in the returns. Those who provided general comments as opposed to filling out the questionnaire still had their comments noted as the list above shows.

Consultation Method 7 Consultation on Draft Core Strategy

Description

The consultation period for the Core Strategy ran between October 31st 2008 and February 16th 2009. A 'drop-in' event was held in the Council House on Thursday 8th January 2009. Presentations took place at regular intervals throughout the day between 10am and 7pm. In between the presentations officers were on hand to discuss any issues with attendees or to hear any suggestions from the public. The day generated a good response with over fifty attendees.

As part of the consultation exercise a wide variety of stakeholders and interested parties were consulted including statutory consultees, parish councils, developers, Registered Social Landlords and the general public. An advertisement was placed in the local newspaper and the Core Strategy was also advertised on the council website to maximise exposure.

Summary of Responses

The consultation period generated a significant amount of feedback with 135 written responses received. Most of these responses commented on many different elements of the document. It is of most relevance that 30 comments were received on the Affordable Housing policy (Core Policy 16). The key points raised in relation to this policy have been summarised:

- Support for 40% affordable housing target
- View that threshold of 10 dwellings is too high
- Concerns that thresholds and targets are too restrictive in economic recession
- Concerns raised about the viability of 40% figure
- Policy should follow approach in PPS3 more closely
- Detailed economic testing required to justify both threshold of 10 and target of 40%
- Unlikely that 5 or dwellings would be built in village envelope due to Green Belt restrictions
- Support for rural exception sites where a need has been identified
- Policy should be applied flexibly to reflect economic climate
- Policy should go into greater detail in terms of tenure split and overall annual target
- Greater weight should be attached to schemes that exceed 40% target
- It is crucial to create mixed communities
- More affordable housing will help to retain young people in the district
- There is a requirement for affordable housing across the district
- The policy should be set against a clear settlement hierarchy

Summary

The responses received were generally very useful and have been fed into the draft Affordable Housing SPD and will also inform the next version of the Core Strategy. Responses emphasised the high the level of need for affordable housing but also reflected that any policy should be justified with robust evidence.



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computer disc.**



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