

About this Consultation

The Alvechurch Parish Neighbourhood Plan 2011-30 was submitted to Bromsgrove District Council on 27th March 2018. The District Council is satisfied the Neighbourhood Plan is in accordance with Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) and is therefore publicising the plan proposal and inviting representations as part of its obligation under Regulation 16 of the above regulations.

In order to give the Council a clear and accurate picture of your views, it is preferred that you make your representation on this specific representation form (although other responses will be accepted). It is important to specify which part of the neighbourhood plan (by page and/or paragraph and/or policy number) you are commenting on.

The representation period is open for 6 weeks from:

Thursday 28th June 2018 to Friday 10th August 2018

Where to view the Documents


During the dates of the representation period, the Alvechurch Parish Neighbourhood Plan can be viewed at the following locations:

- **Online at <http://www.bromsgrove.gov.uk/alvechurchnp> or on the Alvechurch Neighbourhood Plan website at <https://alvechurchparishplan.org/>**
- **In hard copy format (during opening hours) at Bromsgrove Library, Parkside, Bromsgrove B61 8DA and Alvechurch Library, Birmingham Road, Alvechurch B48 7TA.**

Supporting submission documents that accompany the Neighbourhood Plan, including a Basic Conditions Statement, Sustainability Appraisal and a Consultation Statement, can also be viewed at the locations above and online.

How to Respond

You can make representations by responding using the following methods:

 Email	strategicplanning@bromsgroveandredditch.gov.uk
 Post	Strategic Planning – Bromsgrove District Council Parkside Market Street Bromsgrove Worcestershire B61 8DA

Data Protection

The information collected will be processed in accordance with the Data Protection Act 2018. Information from the forms will be stored on a computer database used solely in connection with the Alvechurch Parish Neighbourhood Plan. All representations received by the District Council will be sent to the person appointed to undertake an independent examination into the Alvechurch Parish Neighbourhood Plan, specifically whether the plan is deemed to meet the 'basic conditions' set out in Schedule 4B para.8(2) of the 1990 Town and Country Planning Act.

Any representation may also include a request to the District Council to be notified of the local authority's decision on whether the neighbourhood plan is to be 'made' in accordance with Regulation 19 of the Neighbourhood Planning (General) Regulations 2012 (as amended). **Please make this request using the question/answer box at the end of this representation form.**

Your contact details

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Privacy Statement

Who is collecting this information

This information is being collected by Bromsgrove District Council.

Why we collect and use this information

We are collecting this information for the purpose of carrying out a statutory representation period on a plan which may become part of the Council's statutory development plan. We are processing this information under the same legal basis.

Storing this information

We will keep your personal data until the plan has been 'made' or until such time as you request to be taken off the database prior to this. It will be used only for the purpose stated and will not be shared or sold.

Data collection requirements

We may need to share the information that you give to us with an independent examiner as part of a legal obligation in the neighbourhood plan making process, but the information will not be used in any profiling/automated decision making.

Further information

If you would like further information about this privacy notice, please contact the Strategic Planning Team at strategicplanning@bromsgroveandredditch.gov.uk

Alvechurch Parish Neighbourhood Plan - Regulation 16 Response Form

Section 1: Introduction and Background

Do you have any comments to make on 'Section 1: Introduction and Background' of the Alvechurch Parish Neighbourhood Plan?

No

Section 2: Alvechurch – Today

Do you have any comments to make on 'Section 2: Alvechurch – Today' of the Alvechurch Parish Neighbourhood Plan?

No

Section 3: The Vision and the Key Aims

Do you have any comments to make on 'Section 3: The Vision and the Key Aims' of the Alvechurch Parish Neighbourhood Plan?

No

Section 4: The Policies of the APNP

Do you have any general comments to make on 'Section 4: The Policies of the APNP' of the Alvechurch Parish Neighbourhood Plan?

No

More specifically, do you have any comments on individual policies or community actions within the APNP topic areas?

Topic 1 – Policies for Housing

Policy H4 7 II - this policy requires that development proposals reflect the prevailing size, layout and access of existing nearby properties and development pattern that is in keeping with the Alvechurch rural locality. This policy is supported but it will not be possible to implement it due to the over rigid mix policy H6 which requires that 50% of new housing developments are 1 and 2 bed flats and dwellings.

Policy H4 7 k - this policy requires parking spaces to be located between houses rather than at the front. Whilst the aim of the policy in trying to ensure vehicles do not dominate the street scene is supported, it is not necessary to preclude parking at the front of buildings to achieve this aim. The attractive historic core of Alvechurch is not typified by parking between buildings. The built form of the historic core tends to be in a continuous frontage close to the highway with on-street parking. This policy anticipates that new development will be of a suburban style that typifies the majority of the built form in the village which is post-war; however, this will not be the case as the rigid mix policy H6 requires that 50% of new dwellings are to be 1 and 2 bed flats and houses.

Policy H6 - this policy seeks to provide a mix of house types and garden space. The requirement to provide a housing mix and 40% affordable housing on sites of 11 dwellings or more is supported. However, Policy H6 3 is not supported and will not meet the basic conditions test.

This policy does not accord with national policy, it does not accord with Policy BDP7 of the Bromsgrove Development Plan (BDP) and it does not reflect the analysis set out in the Worcestershire SHMA 2012. In addition, there is emerging evidence which demonstrates that;

- people do not necessarily occupy a house that 'fits' their household size.
- that the majority of elderly people do not wish to downsize and
- that home working is increasing.

This evidence suggests that such a prescriptive house size policy would not meet the needs of the future population, in contrast to the stated aim of the policy and would therefore fail to meet the strategic aims of the BDP.

National policy in the 2012 NPPF at paragraph 50 states that local planning authorities should plan for a mix of housing based on future demographic trends, market trends and the needs of different groups, and identify the size, type tenure and range of housing that is required reflecting local demand (my emphasis).

The neighbourhood plan seeks support from the Worcestershire Strategic Housing Market Assessment (SHMA) for its approach to future housing mix. Whilst there is a quote from that document, it is important to consider the findings of the SHMA Appendix 2 Bromsgrove Overview. At paragraph 3.6 bullet point 8 the SHMA Bromsgrove Appendix states;

“The changing age profile of the projected population of the authority indicates that there will be a high demand for smaller properties able to meet the needs of older person households. Overall the number of older persons is projected to increase significantly, indeed the projections suggest that older persons will make up approximately 33% of the total population by 2030 compared to just over 21% now.

In addition to older person households the projections also indicate that in order to maintain a level of working age population to match employment opportunities that there will be a sustained need for family housing within the authority.”

This analysis is reflected in the reasoned justification to Bromsgrove Local Plan policy BDP7. At paragraph 8.66 it notes that:

“Whilst the Number of family homes is set to decline overall it is important to recognise that this is not true for all age groupings, with notable increase in the number of family households where the head of the household is aged between 25 - 34 and 45 - 49. It is therefore considered that there is likely to be a sustained demand for family housing recognising that moderate and larger properties represent the aspiration for many households of different age groups.”

Limiting 4 beds to 10% will not meet the sustained need for family housing. And while at paragraph 8.67 the local plan recognises that Bromsgrove District has a high proportion of large 4 and 5 bedroom homes, the text is concerned with building realistic alternatives for the ageing population (my emphasis).

Policy BDP7 itself actually requires a wider mix of housing than 2 and 3 bedroom properties on schemes of 10 or more dwellings:

BDP7.1 Proposals for housing but take account of identified housing needs in terms of the size and type of dwellings. To ensure mixed and vibrant communities are created development proposals need to focus on delivering 2 and 3 bedroom properties. On schemes of 10 or more dwellings it is accepted that a wider mix of dwelling types may be required.”

Lichfields (formerly NLP) have undertake research on this matter for Lone Star Land. Lichfields looked at evidence on households and occupancy. The 2011 census showed there were 18m households in England of which 11.6m were families. According to ONS standards of occupancy ,700,000 households were overcrowded at the time of the 2011 Census, of which 400,000 had dependent children. A total of 3.8m households occupied housing in line with their needs - one fifth of all households. A total of 7m households had 2 spare bedrooms. The co-existence of under-occupancy and overcrowding in the private housing market highlights the imbalance that existing between household size and dwelling size. Many households will occupy housing which they can afford and aspire to which is often larger than their needs. Indeed, the ONS data highlights the difficulty in prescribing housing mix requirements based on household size, as ‘standard’ occupancy appears to be the exception rather than the rule. This point on aspiration is reflected in the analysis of the SHMA and the BDP policy quoted above

Lichfields also looked at household migration. A prescriptive mix policy such as Policy H6 assumes that those older households that are under-occupying will 'downsize' to a smaller dwelling, freeing up the larger dwelling. As indicated above, census data already shows that this does not happen, with 2.4m households aged over 65 having at least 2 spare bedrooms and a further 1.4m with 1 spare bedroom. A total of 3.8m households occupying homes in excess of their needs. This might reflect a lack of supply of properties to downsize into but research suggests there is a strong preference for older people to remain in their existing home.

Research by the University of York (Housing Choices and Aspirations of Older People 2008) found that the majority of older households were happy with their home, regardless of the type of property, having invested time and resources into the home, and that any potential issues arising with size or accessibility were not too great to be overcome, e.g. through adaptation. Some also felt that moving would be stressful and overwhelming, and potentially result in the (unwanted) disposal of possessions. Even so, when older households considered the type of housing which would be seen as 'ideal', a minimum of two-bedrooms was seen as essential, as well as sufficient living space e.g. for eating and recreation. In addition, research by the Joseph Rowntree Foundation (Older People's Housing: Choice, Quality of Life and Under-Occupation 2012) showed that 85% of larger housing released by older people is released due to death, as opposed to choosing to downsize. The latest English Housing Survey (EHS) supports these findings showing the older households are the least likely to move with just 1.75% of older households moving within the last year. The EHS also shows that the age 75 and over households are the most satisfied with their housing (97.2% are satisfied or very satisfied).

The evidence is clear that while older households are the most likely to under-occupy, they are the most satisfied with their housing and the most likely to stay put. Though some older households may be looking to downsize, the majority are unlikely to move and intend to remain in the family home.

Lichfields have also discovered that there has been a steady rise in the proportion of the workforce working from home. At 2015, 13.7% of people in employment work from home. And home-working typically increases with age from 5.1% of 16 - 24 year olds to 38.3% of people aged 65+. So the ageing population (combined with the increase in pension age) is likely to further increase the proportion of home working. Increases in the number of people working from home will translate into a demand for larger housing as people seek additional space, e.g. a spare room for use as an office. Research by London School of Economics/Acas (Home is Where the Work Is 2013) found that the majority of homeworkers surveyed use a separate room/office that is only used for work, with this being a key aspect of separating work and home life

It should also be noted that there are Local Planning Authorities that operate percentage mix policies. All of the policies, whether in adopted or

where the percentage are taken from a SHMA, are flexible and do not require that the specific percentages are met. In spite of this, in practice all proposals are expected to comply with the listed percentages. Therefore, if percentages are to be listed they must be the right ones to achieve the future housing needs. The NDP percentages are very different from what might be expected from the SHMA evidence. It is worth considering the policies as they operate in nearby authorities with similar issues regarding size of current stock, ageing population and relative cost of housing.

Stratford upon Avon 1 bed = 5-10%; 2 bed = 35-40%; 3 bed = 40-45%; 4+bed = 15-20%

Warwick - 1-bed = 5-10%; 2 beds = 30%; 3 bed = 40 - 45% 4+ bed = 20-25%

Wychavon 1-2 bed = 35%; 3 bed = 35%; 4+ bed = 30%

Malvern Hills-2 bed = 35%; 3 bed = 35%; 4+ bed = 30%

All of the above percentages are of the market housing mix and exclude affordable housing. The most notable difference is the very low percentage of 4 beds proposed under the Alvechurch NDP policy H6 with a 10% limit on 4=bed properties, in contrast to 20% in Stratford to 30% in Wychavon and Malvern. As this figure would include the affordable dwellings under the Alvechurch policy, the market figure would be even lower. Such a restriction on family homes would not be in general conformity with BDLP policy BDP7 quoted above.

As set out above under comments on the design policies, a mix policy that delivers 50% of the dwellings as 1 and 2 beds will not enable the design policies of this NDP to be implemented and will result in developments that are out of character with Alvechurch. The policy needs to recognise that design considerations may warrant a different mix.

Topic 2 – Policies for Heritage, Design and the Natural Environment

No

Topic 3 – Policies for Leisure, Health and Well-Being

No

Topic 4 – Policies for Businesses, Shops and Services

Policy BSS3 c - this policy seeks to support the more effective use of existing business sites, particularly Bordesley Hall. It is noted that the policy is subject to Bromsgrove Local Plan policy BDP14. In that regard the policy is supported.

Policy BSS7 seeks to support Bordesley Hall as a business centre and make efforts to maintain employment opportunities for local people.

We are grateful that the evidence from Harris Lamb has been incorporated into the submission version of the NDP and that the NDP acknowledges that remodelling, extension and new build may be needed.

However, the introduction at paragraph 4.319 is much more restrictive than Bromsgrove Local Plan policy BDP4 on the Green Belt. Paragraph 4.319 restricts any redevelopment or extensions to the footprint of the hall and its outbuildings. Paragraph 4.326 of the reasoned justification uses strong language and sets the same restriction. Local Plan Policy BDP4.4 sets out the type of new development in the green belt that is not inappropriate development. Category d) states that proportionate extensions to non-residential buildings are not inappropriate development. The policy goes on to state that proposals that can demonstrate significant benefits to the the local economy and/or community will be considered favourably. In addition, category g) states that limited infilling or the partial or complete redevelopment of previously developed sites that would not have a greater impact on the openness of the Green Belt and the purposes of including land within it would also not be

inappropriate development. The Local Plan policy reflects national Green Belt policy in the 2012 NPPF (and, for that matter, the 2018 version).

As a result the restriction of redevelopment and extension to the existing hall and outbuildings does not meet the basic conditions tests. It should be reworded to reflect the Local Plan.

Paragraph 4.319 of the NDP also states that new build should have ‘minimal impact’ on nearby residents. It is not clear why this requirement is in quotation marks. In any event, this is not the test in the actual policy or that explained in the reasoned justification at paragraph 4.325. The text in paragraph 4.319 should not set a higher bar than the actual policy it is seeking to introduce and should align with paragraph 4.325.

The actual policy itself does not reflect NDP policy BSS3c or Local Plan policy BDP 14.4. and 14.5. If the site becomes unviable for whatever reason, simply resisting a change of use from employment to another use, whether it be general housing or some other use, would not be in general accordance with the local plan or comply with national policy. NDP policy BSS7 should state that any development at the site that would result in the loss of employment land at the site for non-employment use would need to comply with local plan policy BDP14.4.

Whilst this is not a matter that cuts to the issue of whether the plan meets the basic conditions, the language used in paragraph 4.326 is very disappointing. The phrase ‘self-styled’ is a pejorative trope and has no place in a development plan.

Topic 5 – Policies for Getting Around and Transport

no

Section 5: Future Growth in the Parish

Do you have any comments to make on 'Section 5: Future Growth in the Parish' of the Alvechurch Parish Neighbourhood Plan?

No

Section 6: Monitoring and Review of the Plan

Do you have any comments to make on 'Section 6: Monitoring and Review of the Plan' of the Alvechurch Parish Neighbourhood Plan?

No

Section 7: Glossary

Do you have any comments to make on 'Section 7: Glossary' of the Alvechurch Parish Neighbourhood Plan?

No

Other Comments

Do you have any other comments on the Alvechurch Parish Neighbourhood Plan, including supporting documents which accompany the plan?

No

Would you like to be notified of the local authority's decision on whether this neighbourhood plan is made, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012?

(If Yes, please ensure your contact details are provided on this form)

Yes

No