

B033

[REDACTED]

Sent: 11 November 2013 12:13
To: BDC strategic planning
Subject: Bromsgrove District Plan - Representations on behalf of Pineview Parks Ltd
Attachments: Form A.pdf; Part B Policy BDP2.pdf; Part B Policy BDP5B.pdf; Part B Policy BDP7.pdf; Part B Policy BDP8.pdf; Part B Policy BDP9.pdf; Part B Policy BDP10.pdf

Please see attached completed Part A with client and agent details and completed Part B in respect of the following policies:

BDP2
BDP5B
BDP7
BDP8
BDP9
BDP10



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Part B (see Note 1 and Note 8 para 4.2)

Please use a separate Part B form for each representation you wish to make

Name or Organisation (see Note 8 para 4.1)

Pineview Parks Ltd

1. To which part of the BDP does this representation relate?

Page:	Paragraph:	Policy: BDP 2
Policies Map:	Other document:	

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

2. Do you consider the BDP is legally compliant? (see Note 2)

Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
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3. Please give details of why you consider the BDP is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

4. Please set out what change(s) you consider necessary to make the BDP legally compliant, having regard to the issue(s) you have identified above. You will need to say why this change will make the BDP legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)

5. Do you consider the BDP is sound? (see Note 3)

Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
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Do you consider the BDP is **unsound** because it is not:

(1) Justified (see Note 4)	<input checked="" type="checkbox"/>
(2) Effective (see Note 5)	<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)	<input checked="" type="checkbox"/>
(4) Positively prepared (see Note 7)	<input checked="" type="checkbox"/>

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

We have submitted representations previously on behalf of Pineview Parks Ltd in response to the Core Strategy 2 consultation in 2011. These representations focussed on the omission of any specific reference to low cost market housing such as park homes within the Core Strategy document; the need to consider an additional tier within the settlement hierarchy to allow housing development on suitable existing sites in the countryside outside of settlements, and the suitability of our client's site at Hillcrest Mobile Home Park to provide such low cost market housing. Given the evidence in the Core Strategy of the need to plan for the housing needs of the elderly, these omissions were considered contrary to national planning policy guidance contained in PPS3 Housing still in force at that time. It was suggested that this issue should be addressed in the wording of Policies CP2, CP4B, CP6, CP7 and CP8.

The Bromsgrove District Plan similarly does not include reference to low cost market housing in the relevant policies. This is considered to be contrary to the NPPF so the BDP fails the test of soundness through not being compliant with national policy. It also does not represent the most appropriate strategy for planning for the housing needs of the District, particularly housing needs of the elderly. The BDP therefore fails the test of soundness through not being justified when compared against reasonable alternatives, and not being positively prepared to meet the Council's objectively assessed housing development requirements.

By not including provision within the settlement hierarchy for the development of low cost market housing on existing suitable locations in the countryside Policy BDP2 is unsound as it is contrary to national policy in the NPPF (para 50); it is not justified as it fails to take account of a reasonable alternative and it not positively prepared as it fails to provide the most effective strategy for achieving the Council's objectively assessed housing development requirements.

Our client objects to Policy BDP2 as it does not make provision for low cost market housing development on suitable existing locations in the open countryside outside of the settlement boundary, only for affordable housing as an exception.

Given there is an established shortage of housing land, a particular housing need for the elderly population, and an acceptance that Greenfield sites will need to be released to meet the housing need, then inclusion of suitable existing countryside locations within the settlement hierarchy would help to achieve the housing needs of the District and provide a reasonable alternative to the development of new Greenfield sites.

Para. 50 of the NPPF is clear in its advice to local planning authorities that they should plan for a mix of housing based on current and future demographic and market trends and the needs of different groups within the community, as well as identifying the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.

Low cost market housing such as park homes can make a significant contribution toward meeting local housing need as distinct from subsidised affordable housing provision. Park homes are similar to two/three bedroom bungalows in layout and appearance, however

they sell for substantially less than similar bricks and mortar properties in the same housing market area. Modern park homes are built to the same exacting high standards as the latest high quality bricks and mortar houses.

Park homes are particularly popular with older people due to their smaller property size, easier single storey living (i.e. lack of stairs) and the significantly lower purchase price which enables elderly and retired people to realise their existing property assets and release capital whilst at the same time freeing up the stock of larger family housing. Park homes are also popular amongst key workers and low income families who do not wish to live in social rented housing and who would prefer to live in a dwelling with a small garden area. As such park homes can provide a form of low-cost market housing to bridge the gap between subsidised affordable housing and open-market bricks and mortar housing. Provision of such housing is vital to those many social groups who are neither eligible to live in subsidised housing, nor able to afford open market housing.

Planned provision for low cost market housing such as park homes also helps to achieve the government's current initiative to promote more bungalow type development in order to meet the housing needs of the elderly population.

The Communities Secretary Eric Pickles recently launched new National Planning Practice Guidance (August 2013) stating that planners will have to ensure that their areas have enough properties of the right mix and type, including clusters of bungalows that will only be available to older people. The Planning Minister Nick Boles said that " *We must build more homes for suitable accommodation for older people if we are to avoid problems further down the track... Making sure councils plan for this, and for enough suitable homes like bungalows in their area, will help ensure the ageing population can live in the places they want and enjoy their retirement.*"

This policy shift to build more bungalows also requires consideration of release of more land. They are built at a lower density than is currently prescribed for housing development and at a recent Planning Association conference in October, planning minister Nick Boles acknowledged " *If we're going to provide for more bungalows we're going to have to provide more land than we otherwise would.*"

Providers of low cost market housing need to develop on sites outside the defined settlement boundaries. If they are to pass on the lower development costs to purchasers by selling at a reduced price compared to mainstream housing they need to benefit from the lower land values as part of their development costs. They cannot compete with housing developers bidding for land within the settlement boundaries who can recoup their costs by selling at open market prices.

The suitability of existing sites could be determined by policy criteria based on the range and criteria of services including shops, healthcare and public transport. Mobile home parks such as Hillcrest Park, for example, are ideally suited being already residential in nature, providing single storey accommodation ideally suited to the elderly, and providing low cost market housing to broaden the housing mix. Hillcrest Park is in a suitable location having the appearance, character and feel of a small village with its own community room, post box, milk/newspaper service and mobile library service. Furthermore, there is pub with restaurant, shop and two bus stops within 100m of the Park. The Park could therefore be classed as a small settlement – and as a result is a strategic location.

Notwithstanding the adjacent amenities, the site is also less than 2km (and therefore within walking distance) of the settlement of Wythall which has a train station offering 20 min journey times to Birmingham as well as a doctors, dentists and a larger food store. Furthermore, the site is within cycling distance (5km) of the larger settlement of Hollywood. In addition, the site has good bus links and these allow access to the Sainsbury's supermarket at Maypole and to Birmingham and Redditch.

Hillcrest can therefore be termed as a very sustainable site – and hence a good location for development in the countryside. The park has capacity for further residential (park home) development on land within the existing screened boundary of the park, adjacent to the main road but accessed from within the park. It therefore provides an opportunity for development without encroaching into the open countryside and will have no adverse impact on the visual amenity or openness of the Green Belt.

7. Please set out what change(s) you consider necessary to make the BDP sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BDP sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) (**see Note 8 para 4.3**)

To make Policy BDP2 sound the following wording should be included in the policy to form a new point BDP 2.4 (the existing point BDP 2.4 on affordable housing would become BDP 2.5):

BDP 2.4 – In the countryside outside of the settlements identified in Table 2, suitable sites on land within or adjacent to existing residential development will be considered for the provision of low cost market housing where there is a proven need for the type of housing proposed and access to public transport and at least one other community facility such as a shop/post office, pub or village hall.

This proposed wording would be consistent with proposed Policy BDP4 Green Belt which recognises that a review of the Green Belt boundary will be necessary to ensure sufficient land in sustainable locations is available to deliver the objectively assessed housing requirement. Point BDP4.3 states that the Green Belt boundary review will follow the approach in BDP2 Settlement Hierarchy and where appropriate settlement boundaries and village envelopes on the Policies Map will be revised to accommodate development.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s), as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

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Participation in the oral examination will be necessary in order to debate the Council's approach to provision for low cost market housing. There is no reference to low cost market housing in the proposed BDP , nor is any acknowledgement or response to our previous representations on low cost market housing included in the consultation feedback section of the policies now proposed.

Policy BDP2 on settlement hierarchy is fundamental to how the issue of low cost market housing is planned for and how release of sites in the wider countryside/Green Belt will be considered. The Council's approach to Policy BDP2 impacts on comments and issues we have raised under other BDP housing policies.

As Policy BPD2 underpins the way other housing policies are implemented it is important that the issues raised under BDP2 in particular are debated between interested parties in the examination process.

Signature: 	Date: 08.11.2013
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Part B (see Note 1 and Note 8 para 4.2)

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Name or Organisation (see Note 8 para 4.1)

Pineview Parks Ltd

1. To which part of the BDP does this representation relate?

Page:	Paragraph:	Policy: BDP 5B
Policies Map:	Other document:	

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Our client objects to Policy BDP5B as it does not include Hillcrest Park as a suitable alternative site for low cost market housing such as park homes.

By not making provision for the development of low cost market housing on suitable sites within the Wythall area Policy BPD5B is unsound as it is contrary to national policy in the NPPF (para 50); it is not justified as it fails to take account of a reasonable alternative and is not positively prepared as it fails to provide the most effective strategy for achieving the Council's objectively assessed housing development requirements.

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Park homes are particularly popular with older people due to their smaller property size, easier single storey living (i.e. lack of stairs) and the significantly lower purchase price which enables elderly and retired people to realise their existing property assets and release

capital whilst at the same time freeing up the stock of larger family housing. Park homes are also popular amongst key workers and low income families who do not wish to live in social rented housing and who would prefer to live in a dwelling with a small garden area. As such park homes can provide a form of low-cost market housing to bridge the gap between subsidised affordable housing and open-market bricks and mortar housing. Provision of such housing is vital to those many social groups who are neither eligible to live in subsidised housing, nor able to afford open market housing.

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Notwithstanding the adjacent amenities, the site is also less than 2km (and therefore within walking distance) of the settlement of Wythall which has a train station offering 20 min journey times to Birmingham as well as a doctors, dentists and a larger food store. Furthermore, the site is within cycling distance (5km) of the larger settlement of Hollywood. In addition, the site has good bus links and these allow access to the Sainsbury's supermarket at Maypole and to Birmingham and Redditch.

Hillcrest can therefore be termed as a very sustainable site – and hence a good location for development in the countryside. The park has capacity for further residential (park home) development on land within the existing screened boundary of the park, adjacent to the main road but accessed from within the park. It therefore provides an opportunity for development without encroaching into the open countryside and will have no adverse impact on the visual amenity or openness of the Green Belt.

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For the reasons stated above Hillcrest Mobile Home Park should be included as a site for the Wythall area under Policy BDP5B as a suitable existing site for provision of low cost market housing such as park homes.

Our objection to Policy BDP5B could be overcome if our suggested wording in Policy BDP2 is adopted, making provision for an additional tier in the settlement hierarchy under which to accommodate sites such as Hillcrest Park.

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No, I do not wish to participate at the oral examination	<input type="checkbox"/>
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Participation in the oral examination will be necessary in order to debate the Council's approach to provision for low cost market housing. There is no reference to low cost market housing in the proposed BDP, nor is any acknowledgement or response to our previous representations on low cost market housing included in the consultation feedback section of the policies now proposed.

The approach to low cost market housing impacts on fundamental housing policies within the BDP, including the settlement hierarchy (BDP2) and allocated sites (BDP5) which in turn influence the way other housing policies are implemented. It is therefore important that the issues raised are debated between interested parties in the examination process.

 Signature:	Date: 08.11.2013
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Part B (see Note 1 and Note 8 para 4.2)

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Name or Organisation (see Note 8 para 4.1)

Pineview Parks Ltd

1. To which part of the BDP does this representation relate?

Page:	Paragraph:	Policy: BDP 7
Policies Map:	Other document:	

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

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Our client objects to Policy BDP7 as it does not include provision for low cost market housing such as park homes within the policy. By not including provision for the development of low cost market housing Policy BDP7 is unsound as it is contrary to national policy in the NPPF (para 50); it is not justified as it fails to take account of a reasonable alternative and is not positively prepared as it fails to provide the most effective strategy for achieving the Council's objectively assessed housing development requirements.

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An additional point should be added into Policy BDP7 to read as follows:

BDP7.3 Where the need for development of single storey dwellings such as bungalows or park homes as a form of low cost market housing is identified then density requirements will be reduced accordingly.

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The approach to low cost market housing impacts on fundamental housing policies within the BDP, including the settlement hierarchy (BDP2) and allocated sites (BDP5) which in turn influence the way other housing policies are implemented. It is therefore important that the issues raised are debated between interested parties in the examination process.

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(3) Consistent with national policy (see Note 6)	<input checked="" type="checkbox"/>
(4) Positively prepared (see Note 7)	<input checked="" type="checkbox"/>

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

We have submitted representations previously on behalf of Pineview Parks Ltd in response to the Core Strategy 2 consultation in 2011. These representations focussed on the omission of any specific reference to low cost market housing such as park homes within the Core Strategy document; the need to consider an additional tier within the settlement hierarchy to allow housing development on suitable existing sites in the countryside outside of settlements, and the suitability of our client's site at Hillcrest Mobile Home Park to provide such low cost market housing. Given the evidence in the Core Strategy of the need to plan for the housing needs of the elderly, these omissions were considered contrary to national planning policy guidance contained in PPS3 Housing still in force at that time. It was suggested that this issue should be addressed in the wording of Policies CP2, CP4B, CP6, CP7 and CP8.

The Bromsgrove District Plan similarly does not include reference to low cost market housing in the relevant policies. This is considered to be contrary to the NPPF so the BDP fails the test of soundness through not being compliant with national policy. It also does not represent the most appropriate strategy for planning for the housing needs of the District, particularly housing needs of the elderly. The BDP therefore fails the test of soundness through not being justified when compared against reasonable alternatives, and not being positively prepared to meet the Council's objectively assessed housing development requirements.

Our client objects to policy BDP8 as it does not include reference to provision of low cost market housing such as park homes within the policy. The policy is unsound because it does not consider a reasonable alternative, is not positively prepared and is contrary to national policy.

Whilst we recognise that Policy BDP8 deals specifically with Affordable Housing provision we feel that reference to provision of low cost market housing should be made within this policy (as part of the Council's approach to provision of low cost market housing), cross-referencing the text we have proposed for Policy BDP2 on settlement hierarchy.

The omission of low cost market housing from the suite of housing policies (including appropriate references within BDP8 on provision of Affordable Housing) means this policy is unsound as it is contrary to national policy in the NPPF (para 50); it is not justified as it fails to take account of a reasonable alternative and is not positively prepared as it fails to provide the most effective strategy for achieving the Council's objectively assessed housing development requirements.

Para. 50 of the NPPF is clear in its advice to local planning authorities that they should plan for a mix of housing based on current and future demographic and market trends and the needs of different groups within the community, as well as identifying the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.

Low cost market housing such as park homes can make a significant contribution toward meeting local housing need as distinct from subsidised affordable housing provision. Park

homes are similar to two/three bedroom bungalows in layout and appearance, however they sell for substantially less than similar bricks and mortar properties in the same housing market area. Modern park homes are built to the same exacting high standards as the latest high quality bricks and mortar houses.

Park homes are particularly popular with older people due to their smaller property size, easier single storey living (i.e. lack of stairs) and the significantly lower purchase price which enables elderly and retired people to realise their existing property assets and release capital whilst at the same time freeing up the stock of larger family housing. Park homes are also popular amongst key workers and low income families who do not wish to live in social rented housing and who would prefer to live in a dwelling with a small garden area. As such park homes can provide a form of low-cost market housing to bridge the gap between subsidised affordable housing and open-market bricks and mortar housing. Provision of such housing is vital to those many social groups who are neither eligible to live in subsidised housing, nor able to afford open market housing.

7. Please set out what change(s) you consider necessary to make the BDP sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BDP sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) **(see Note 8 para 4.3)**

An additional point should be added after point BDP8.3 as follows. Point BDP8.4 would then become BDP8.5

BDP8.3 – provision will also be made for low cost market housing as a means of meeting local housing need either within housing development proposals generally or on sites specifically approved for low cost market housing under Policy BDP2.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s), as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.


8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? **Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

No, I do not wish to participate at the oral examination	<input type="checkbox"/>
Yes, I wish to participate at the oral examination	<input checked="" type="checkbox"/>

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Continue on a separate sheet /expand box if necessary)

Participation in the oral examination will be necessary in order to debate the Council's approach to provision for low cost market housing. There is no reference to low cost market housing in the proposed BDP , nor is any acknowledgement or response to our previous representations on low cost market housing included in the consultation feedback section of the policies now proposed.

The approach to low cost market housing impacts on fundamental housing policies within the BDP, including the settlement hierarchy (BDP2) and allocated sites (BDP5) which in turn influence the way other housing policies are implemented. It is therefore important that the issues raised are debated between interested parties in the examination process.

Signature: 	Date: 08.11.2013
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Part B (see Note 1 and Note 8 para 4.2)

Please use a separate Part B form for each representation you wish to make

Name or Organisation (see Note 8 para 4.1)

Pineview Parks Ltd

1. To which part of the BDP does this representation relate?

Page:	Paragraph:	Policy: BDP 9
Policies Map:	Other document:	

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

2. Do you consider the BDP is legally compliant? (see Note 2)

Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
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3. Please give details of why you consider the BDP is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

4. Please set out what change(s) you consider necessary to make the BDP legally compliant, having regard to the issue(s) you have identified above. You will need to say why this change will make the BDP legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)

5. Do you consider the BDP is sound? (see Note 3)

Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
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Do you consider the BDP is **unsound** because it is not:

(1) Justified (see Note 4)	<input checked="" type="checkbox"/>
(2) Effective (see Note 5)	<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)	<input checked="" type="checkbox"/>
(4) Positively prepared (see Note 7)	<input checked="" type="checkbox"/>

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

We have submitted representations previously on behalf of Pineview Parks Ltd in response to the Core Strategy 2 consultation in 2011. These representations focussed on the omission of any specific reference to low cost market housing such as park homes within the Core Strategy document; the need to consider an additional tier within the settlement hierarchy to allow housing development on suitable existing sites in the countryside outside of settlements, and the suitability of our client's site at Hillcrest Mobile Home Park to provide such low cost market housing. Given the evidence in the Core Strategy of the need to plan for the housing needs of the elderly, these omissions were considered contrary to national planning policy guidance contained in PPS3 Housing still in force at that time. It was suggested that this issue should be addressed in the wording of Policies CP2, CP4B, CP6, CP7 and CP8.

The Bromsgrove District Plan similarly does not include reference to low cost market housing in the relevant policies. This is considered to be contrary to the NPPF so the BDP fails the test of soundness through not being compliant with national policy. It also does not represent the most appropriate strategy for planning for the housing needs of the District, particularly housing needs of the elderly. The BDP therefore fails the test of soundness through not being justified when compared against reasonable alternatives, and not being positively prepared to meet the Council's objectively assessed housing development requirements.

Our client objects to policy BDP9 as it does not include reference to suitable sites for provision of low cost market housing such as park homes within the policy. The policy is unsound because it does not consider a reasonable alternative, is not positively prepared and is contrary to national policy.

Whilst we recognise that Policy BDP9 deals specifically with rural exception sites for the provision of Affordable Housing we feel that reference to provision of low cost market housing should be made within this policy (as part of the Council's approach to provision of low cost market housing), cross-referencing the text we have proposed for Policy BDP2 on settlement hierarchy.

The omission of low cost market housing from the suite of housing policies (including appropriate references within BDP9 on provision of suitable sites for Affordable Housing) means this policy is unsound as it is contrary to national policy in the NPPF (para 50); it is not justified as it fails to take account of a reasonable alternative and is not positively prepared as it fails to provide the most effective strategy for achieving the Council's objectively assessed housing development requirements.

Para. 50 of the NPPF is clear in its advice to local planning authorities that they should plan for a mix of housing based on current and future demographic and market trends and the needs of different groups within the community, as well as identifying the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.

Low cost market housing such as park homes can make a significant contribution toward meeting local housing need as distinct from subsidised affordable housing provision. Park homes are similar to two/three bedroom bungalows in layout and appearance, however they sell for substantially less than similar bricks and mortar properties in the same housing market area. Modern park homes are built to the same exacting high standards as the latest high quality bricks and mortar houses.

Park homes are particularly popular with older people due to their smaller property size, easier single storey living (i.e. lack of stairs) and the significantly lower purchase price which enables elderly and retired people to realise their existing property assets and release capital whilst at the same time freeing up the stock of larger family housing. Park homes are also popular amongst key workers and low income families who do not wish to live in social rented housing and who would prefer to live in a dwelling with a small garden area. As such park homes can provide a form of low-cost market housing to bridge the gap between subsidised affordable housing and open-market bricks and mortar housing. Provision of such housing is vital to those many social groups who are neither eligible to live in subsidised housing, nor able to afford open market housing.

7. Please set out what change(s) you consider necessary to make the BDP sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BDP sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) **(see Note 8 para 4.3)**

An additional point should be added after point BDP9.6 as follows.

BDP9.7 –suitable sites for the provision of low cost market housing outside of the settlements are assessed under Policy BDP2.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s), as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.


8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? **Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

No, I do not wish to participate at the oral examination	<input type="checkbox"/>
Yes, I wish to participate at the oral examination	<input checked="" type="checkbox"/>

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Continue on a separate sheet /expand box if necessary)

Participation in the oral examination will be necessary in order to debate the Council's approach to provision for low cost market housing. There is no reference to low cost market housing in the proposed BDP , nor is any acknowledgement or response to our previous representations on low cost market housing included in the consultation feedback section of the policies now proposed.

The approach to low cost market housing impacts on fundamental housing policies within the BDP, including the settlement hierarchy (BDP2) and allocated sites (BDP5) which in turn influence the way other housing policies are implemented. It is therefore important that the issues raised are debated between interested parties in the examination process.

Signature: 	Date: 08.11.2013
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Part B (see Note 1 and Note 8 para 4.2)

Please use a separate Part B form for each representation you wish to make

Name or Organisation (see Note 8 para 4.1)

Pineview Parks Ltd

1. To which part of the BDP does this representation relate?

Page:	Paragraph:	Policy: BDP 10
Policies Map:	Other document:	

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

2. Do you consider the BDP is legally compliant? (see Note 2)

Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
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3. Please give details of why you consider the BDP is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

4. Please set out what change(s) you consider necessary to make the BDP legally compliant, having regard to the issue(s) you have identified above. You will need to say why this change will make the BDP legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)

5. Do you consider the BDP is sound? (see Note 3)

Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
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Do you consider the BDP is **unsound** because it is not:

(1) Justified (see Note 4)	<input checked="" type="checkbox"/>
(2) Effective (see Note 5)	<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)	<input checked="" type="checkbox"/>
(4) Positively prepared (see Note 7)	<input checked="" type="checkbox"/>

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

We have submitted representations previously on behalf of Pineview Parks Ltd in response to the Core Strategy 2 consultation in 2011. These representations focussed on the omission of any specific reference to low cost market housing such as park homes within the Core Strategy document; the need to consider an additional tier within the settlement hierarchy to allow housing development on suitable existing sites in the countryside outside of settlements, and the suitability of our client's site at Hillcrest Mobile Home Park to provide such low cost market housing. Given the evidence in the Core Strategy of the need to plan for the housing needs of the elderly, these omissions were considered contrary to national planning policy guidance contained in PPS3 Housing still in force at that time. It was suggested that this issue should be addressed in the wording of Policies CP2, CP4B, CP6, CP7 and CP8.

The Bromsgrove District Plan similarly does not include reference to low cost market housing in the relevant policies. This is considered to be contrary to the NPPF so the BDP fails the test of soundness through not being compliant with national policy. It also does not represent the most appropriate strategy for planning for the housing needs of the District, particularly housing needs of the elderly. The BDP therefore fails the test of soundness through not being justified when compared against reasonable alternatives, and not being positively prepared to meet the Council's objectively assessed housing development requirements.

Our client objects to policy BDP10 as it does not include provision for low cost market housing such as park homes (which would cater for the housing needs of the elderly) within the policy or make reference to the need for plan for more bungalows.

The omission of low cost market housing and bungalow development from Policy BDP10 means this policy is unsound as it is contrary to national policy in the NPPF (para 50); it is not justified as it fails to take account of a reasonable alternative and is not positively prepared as it fails to provide the most effective strategy for achieving the Council's objectively assessed housing development requirements.

Para. 50 of the NPPF is clear in its advice to local planning authorities that they should plan for a mix of housing based on current and future demographic and market trends and the needs of different groups within the community, as well as identifying the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.

Low cost market housing such as park homes can make a significant contribution toward meeting local housing need as distinct from subsidised affordable housing provision. Park homes are similar to two/three bedroom bungalows in layout and appearance, however they sell for substantially less than similar bricks and mortar properties in the same housing market area. Modern park homes are built to the same exacting high standards as the latest high quality bricks and mortar houses.

Park homes are particularly popular with older people due to their smaller property size, easier single storey living (i.e. lack of stairs) and the significantly lower purchase price which

enables elderly and retired people to realise their existing property assets and release capital whilst at the same time freeing up the stock of larger family housing. As such park homes can provide a form of low-cost market housing to bridge the gap between subsidised affordable housing and open-market bricks and mortar housing. Provision of such housing is vital to those many social groups who are neither eligible to live in subsidised housing, nor able to afford open market housing.

The Communities Secretary Eric Pickles recently launched new National Planning Practice Guidance (August 2013) stating that planners will have to ensure that their areas have enough properties of the right mix and type, including clusters of bungalows that will only be available to older people. The Planning Minister Nick Boles said that " We must build more homes for suitable accommodation for older people if we are to avoid problems further down the track... Making sure councils plan for this, and for enough suitable homes like bungalows in their area, will help ensure the ageing population can live in the places they want and enjoy their retirement."

7. Please set out what change(s) you consider necessary to make the BDP sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BDP sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) **(see Note 8 para 4.3)**

Additional text should be added as follows to existing Point BDP10.2 to cross-reference with the comments we have requested on low cost market housing provision under BDP2. (BDP10.2).....Development of bungalows and provision of low cost market housing such as park homes will be encouraged. In appropriate locations, sites will be approved under Policy BDP2 for provision of low cost market housing and density requirements amended accordingly under Policy BDP7.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s), as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? **Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.


No, I do not wish to participate at the oral examination	<input type="checkbox"/>
Yes, I wish to participate at the oral examination	<input checked="" type="checkbox"/>

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Continue on a separate sheet /expand box if necessary)

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Participation in the oral examination will be necessary in order to debate the Council's approach to provision for low cost market housing. There is no reference to low cost market housing in the proposed BDP, nor is any acknowledgement or response to our previous representations on low cost market housing included in the consultation feedback section of the policies now proposed.

The approach to low cost market housing impacts on fundamental housing policies within the BDP, including the settlement hierarchy (BDP2) and allocated sites (BDP5) which in turn influence the way other housing policies are implemented. It is therefore important that the issues raised are debated between interested parties in the examination process.

Signature: 	Date: 08.11.2013
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