



Mr A Smith
Chair of NDP Steering Group
Alvechurch Parish Council
1A George Road
Alvechurch
Worcestershire
B48 7PB

16th November 2017

via email

Dear Mr Smith,

**Alvechurch Neighbourhood Plan, Pre-submission Final Version
Comments on behalf of the Corbally Group - Bordesley Hall**

The Corbally Group own Bordesley Hall. Lone Star Land is instructed by Corbally to comment on the Pre-submission Final Version of the neighbourhood plan.

Our clients welcome the overall positive approach set out in the neighbourhood plan, and, in particular, the commitment set out set in paragraph 2.17 to work with Bromsgrove District Council on a future Green Belt review. However, they are concerned that the policies relating to Bordesley Hall are too restrictive.

Introduction

1. Government policy in the National Planning Policy Framework (the Framework) sets out, at paragraph 16, the implications of the presumption in favour of sustainable development for neighbourhood planning. Neighbourhoods will need to develop plans that support the strategic development needs set out in Local Plans and to plan positively to support local development by shaping and directing development in their area that is outside the strategic elements of the local plan.
2. Similarly, at paragraph 184 of the Framework, government policy is that neighbourhood plans must be in general conformity with the strategic policies of the local plan and plan positively to support those policies.
3. Government guidance requires that policies in a neighbourhood plan should be clear and unambiguous. They should be drafted with sufficient clarity that a decision maker can apply them consistently and with confidence when determining planning applications. They should be concise, precise and supported by appropriate evidence (National Planning Practice Paragraph: 041 Reference ID: 41-041-20140306).
4. In order to proceed to referendum and be made, the Town and Country Planning Acts set out that neighbourhood plans must meet a set of basic conditions. For plan making these are;
 - having regard to national policies and guidance issued by the Secretary of State it is appropriate to make the plan,
 - the making of the plan contributes to the achievement of sustainable development,
 - the making of the order is in general conformity with the strategic policies contained within the development plan for the area,
 - the making of the plan does not breach EU obligations,
 - the prescribed conditions are met (no significant impact on a European wildlife site and having regard to all material considerations).



5. The specific comments set out below are made in the context of the statutory and policy requirement summarised above.

Policy 2 - Locations for New Housing

6. Criterion 'f' of this policy does not reflect the cost-benefit approach of the Framework. For example, criterion 'f' states that development shall not have an adverse impact on heritage assets; however, national policy at paragraph 133 and 134 of the Framework does allow for some harm to occur to heritage assets provided that the harm is outweighed by public benefits. In the case of substantial harm, paragraph 133 states that an application should be refused unless it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits. In the case of less than substantial harm, the harm should be weighed against the public benefits of the proposal. Criterion 'f' should be reworded to be consistent with national policy.
7. Criterion 'i' seeks to ensure that new development should be within 15 - 20 minutes comfortable walk of the village centre. This requirement does not take account of the fact that three important village facilities, the primary school, the railway station and the Bordesley Hall employment area are not in the village centre.

Policy 7 Providing a Mix of Housing Types

8. At paragraph 4.1.119 this policy sets out a very prescriptive mix of dwelling sizes for new developments of 10 dwellings or more. 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 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.
9. National policy in the Framework 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).
10. 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 projected trends identified above around the changing demographic profile of Bromsgrove are likely to alter the types and sizes of houses which will be required in the future. The analysis suggests that there may be a high demand for smaller properties suitable for meeting the needs of older person households within the authority. Whilst the number of family households is set to decline overall it is important to recognise that this is not true for all age groupings and therefore there is likely to be a sustained demand for traditional housing units (3 and 4 bedroom stock), recognising that moderate and larger properties represent the aspiration for many households of different ages”



In the conclusion, under the heading 'Ensuring a Balanced Housing Market' at paragraphs 4.3 the 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.”

11. 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.”

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).

12. 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.”

13. Lichfields (formerly NLP) have undertaken 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.
14. Lichfields also looked at household migration. A prescriptive mix policy such as Policy 7 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.

15. 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).
16. 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.
17. 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 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.
18. To conclude on this point, the prescriptive nature of Policy 7 is not consistent with national policy, it does not have regard to the local plan and it does not reflect the evidence in the SHMA upon which it is based, nor new evidence on how the housing market actually operates.

Policy 12 Protecting Landscape and Open Views

19. This policy deals with more than the protection of landscape and views as it directs development to land of lesser environmental value and seeks to protect high-value agricultural land. In that regard the policy is missing an important element in conflict with government policy in the Framework and the Bromsgrove Local Plan.
20. Paragraph 17 of the Framework sets out 12 core planning principles. Policy 12 incorporates the 7th principle, namely the allocations of land for development should prefer land of lesser environmental value. However, Policy 12 does not encourage the effective use of land by promoting the re-use of previously developed land. This is the 8th planning principle set out in paragraph 12 of the Framework. It is also covered by paragraph 111 of the Framework.
21. The re-use of land is also a strategic principle of the Bromsgrove Local plan - S09



Policy 21 - Safeguarding Existing Businesses
Policy 25 - Bordesley Hall Employment Area

22. Policy 21 seeks to safeguard existing business premises subject to Bromsgrove Local Plan policy BDP 14. It that regard it is supported. Policy BDP 14.5 notes, in line with the Framework, that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.
23. It should be noted that Bordesley Hall did not feature at all in the Bromsgrove District Employment Land Review that provided the evidence base for the BDP policy 14. As is set out in the neighbourhood plan, Bordesley Hall is continuing to to lose occupants
- 2014 - 48 companies and 294 people based at the site.
 - 2016 - 31 companies and 155 people based at the site
 - 2017 - 26 companies and 70 people based at the site (figures from Harris Lamb letting agents)
- Advice from Harris Lamb is that, while the site is attractive to some local businesses, it is perceived to be in a relatively remote location by other potential occupiers. It is also the case that the whole site is in need of significant modernisation which will be costly.
24. Policy 25 sets out that efforts will be made to maintain the employment opportunities for local people at the site but no measures are set out except in two regards.
25. Firstly, the policy sets out to support new building at the site but this does not take account of the Green Belt policies that the site is subject to, which will inevitably restrict the amount of new building that could take place. Criterion 1 requires that there be no adverse impact on the amenities of surrounding residential or recreational users. This is too high a test. In order to meet the purpose of the policy (to encourage new building and investment), the test should be that there is no undue adverse impact on the amenities of surrounding residential or recreation users.
26. Secondly the policy seeks to restrict, totally, any residential use or building on the site.
27. It is considered that this policy, as written, is not positively prepared and is too rigid. Given the problems outlined above, the future of the site needs to be reviewed. This would be best achieved through a masterplanning approach which would include market assessment, viability testing, and community consultation. The masterplanning exercise may result in a mixed use redevelopment of the site which could include residential, care, extra care, or retirement uses or development as part of a package of measures that are deliverable as well as sustainable.

Community Action 8 - Future Growth in the Parish

28. The commitment to working with Bromsgrove District Council in order that future growth is accommodated through a Green Belt review is supported. It is worth noting that there is already a known requirement of 2300 dwellings to be found on green belt sites for development post 2023, as set out in the BDP. In addition, Bromsgrove will be required to take a share of the unmet need emanating from Birmingham (known to be 38,000 dwellings in total). Alvechurch is ideally placed to accommodate some of that future growth, being one of the six larger settlements in the District as well as having a sustainable rail transport link to Birmingham.
29. This section of the neighbourhood plan provides an opportunity to set out the principles which will govern the site selection process. These should echo the principles in the Framework and the draft Neighbourhood Plan policies APNP 2 and 12; namely that brownfield sites should be prioritised and land of lessor environmental value should be allocated in preference to that of



higher environmental value. There may be a role for Bordesley Hall to play, depending on the masterplanning process highlighted above.

Yours sincerely,

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Planning Director