

Please state which part of the Neighbourhood Plan (i.e. which section, objective or policy) your representation refers to (please use a separate form for each representation):

Policy TOAD2

Please use the space below to make comments on this part of the Neighbourhood Plan.

Please refer to the attached representation.

Please use a separate form for each representation.

Please state whether you would like to be notified of the Council's decision on the Neighbourhood Plan proposal:

Yes

No

Please email this form to policy.plans@wychavon.gov.uk or post it to Planning Policy, Wychavon District Council, Civic Centre, Queen Elizabeth Drive, Pershore, WR10 1PT.



Planning Policy
Wychavon District Council
Civic Centre
Queen Elizabeth Drive
Pershore
WR10 1PT

15 April 2021
Job Ref: [REDACTED]
SENT VIA EMAIL

Dear Sir/Madam,

RE: Ombersley and Doverdale Neighbourhood Plan Regulation 16 Consultation

We wish to make some brief comments on the Ombersley and Doverdale Neighbourhood Plan, which is currently subject to a Reg 16 consultation, ending at 5pm on Friday 16th April. These comments are made on behalf of Spitfire Homes.

As previously stated, Spitfire are broadly supportive of the aims and objectives of the Neighbourhood Plan, however they have a couple of concerns in relation to the following elements:

In relation to Policy TOAD2: Housing Mix: we note that the policy states that, subject to viability considerations, "schemes of five or more units, approximately 50% of market homes should be provided as one- or two-bedroom properties, approximately 40% as three-bedroom properties and approximately 10% with four or more bedrooms, unless up to date evidence on local need or viability suggests otherwise".

As a clear summary, we have produced the following table which compares the requirement of Policy TOAD2 to Wychavon's latest Housing Mix position statement, based on the latest Strategic Housing Market Assessment (SHMA) (September 2019)¹:

Policy TOAD2		Wychavon's Housing Mix position statement	
Property Size	Percentage	Property Size	Percentage
1 or 2 bed properties	50%	2-bed properties	24.5%
3-bed properties	40%	3-bed properties	51%
4-bed + properties	10%	4-bed + properties	24.5%

This comparison reveals a notable difference between the suggested NDP policy, and that based upon the latest SHMA evidence. For instance, the requirement for larger family homes is less than half that required by Wychavon DC, whilst the need for three bed properties is also underestimated. This is because of such a high preference in the NDP towards 1 and 2-bed properties. However, the Wychavon housing mix does not require 1-bed properties because the latest SHMA found an oversupply of properties of this size.

This dichotomy may be explained within the Housing Needs Assessment (HNA)², published in February 2019. Paragraphs 30-38 sets out the 'relevant data' used in the production of the HNA, which states that the HNA uses the 2012 SHMA. But as it has been pointed out already, there is an updated version that was produced in 2019,

¹ [https://www.swdevelopmentplan.org/?option=com_fileman&view=file&routed=1&name=SHMA-Wychavon-Final-Report-02-Sept19.pdf&folder=Documents%2FSouth Worcester Development Plan%2FSWDP Review%2FEvidenceBase%2FSHMA&container=fileman-files](https://www.swdevelopmentplan.org/?option=com_fileman&view=file&routed=1&name=SHMA-Wychavon-Final-Report-02-Sept19.pdf&folder=Documents%2FSouth%20Worcestershire%20Development%20Plan%2FSWDP%20Review%2FEvidenceBase%2FSHMA&container=fileman-files)

² <https://www.toad.works/downloads/general-documents>



which of course is far more recent. The report states it also used the Parish Housing Needs Survey from 2017, which is now 4 years old. Crucially, the HNA was unable to take account of more up to date information (the 2019 SHMA), which we consider to be a critical omission, particularly as the 2012 SHMA used in the report will likely be 10 years old by the time the NDP is Made.

Moreover, paragraph 6.2 of the Draft NDP states that *“the building of smaller dwellings will allow older households to downsize, thereby making larger family housing available for those in need”*. Whilst this may hold some credibility in theory, the availability of larger (4+ bed) family homes is thus predicated on older people downsizing from larger properties. Though of course, there is no guarantee that older people would always seek to ‘downsize’ in any case, and this is not considered a sound basis on which to provide adequate housing.

Had the latest SHMA been used in the HNA, it is likely that its recommendations would have been significantly different, which would have had an impact on Policy TOAD2, given that this was directly used to influence this policy. On this basis, we would question whether Policy TOAD2 accurately reflects local need.

The Basic Conditions Statement (February 2021) is intended to demonstrate how the NDP meets the necessary legal requirements and the prescribed basic conditions. Table 3 states that Policy TOAD2: Housing Mix is in general conformity with strategic policy SWDP 14 Market Housing Mix. However, this is considered erroneous. If the NDP is not based on the latest SHMA and expresses such a stark disparity between the required policy mix and that requested within the SWDP, the NDP cannot be in ‘general conformity’.

The NDP risks creating a conflict between the more up to date evidence in the SHMA, and its own outdated assumptions on local need. This could be particularly challenging for developers and the Local Planning Authority, when proposing or determining planning applications.

We do acknowledge that the NDP states that the requirements of Policy TOAD 2 are subject to viability considerations, but a development comprised of 50% 1 and 2-bed properties, and only 10% 4-bed + properties is rarely likely to be viable for many developers, particularly in areas of high demand for family housing (such as Ombersley). This means that applicants will have to spend more time and money producing a viability assessment, which would be unnecessary, had the NDP accorded with the latest version of the SHMA (2019). This will delay the provision of much needed new homes in the Parish.

Nevertheless, the remainder of the NDP policies appear acceptable, particularly those at TOAD3, which related to the site at Woodhall Lane. Our clients, Spitfire Homes, have addressed all of these requirements in their current planning application, which is awaiting determination by Wychavon District Council.

Yours sincerely



Joe Bennett, BSc (Hons)
Planning Consultant

