

Comment id: SNDPR15

Mr Able & Mr Wylie (Fisher German)

21 May 2025

via Agent: James Beverley (Fisher German)

Please state which part of the Neighbourhood Plan (for example which section, paragraph or policy) your representation relates too:

Policy H1: Dwelling Mix

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

Policy H1 is separated into two parts, the first provides a target dwelling mix for new applications which differs from the strategic evidence of the SHMA, whilst the second relates to scenarios where deviation from housing mix would be supported. We comment on these elements in turn.

Starting with the proposed mix, the Reasoned Justification asserts that there remains a lack of smaller housing in Shenstone and that smaller properties are needed for both older people downsizing and also to attract younger people the village to prevent it becoming a 'retirement community' (Paragraph 5.10). These factors result in a mix which whilst favouring 3bed properties specifically (40%- 50% of dwellings), has a requirement of 40%-50% of properties being only one or two bed. Whilst we understand the groups rationale, we disagree with the underpinning logic.

For example, the Council states it wants to increase the supply of smaller housing to regenerate the community by increasing the number of younger people staying in or moving to the village. Due to house price growth, most first time buyers do not buy now until much later in life than was seen historically. Many first time buyers are now well into there 30's, and thus the buying patterns of first time buyers are more commonly straight into family housing. The costs of selling and buying houses has also increased, particularly having regard for stamp duty and other moving costs. As such, the practice of laddering from a 1-2 bedroom unit into a larger family house is simply not as common practice as it once was and most people given their age want to move straight into a suitable, larger family house. As such, simply over providing smaller units will not necessarily support the demographic shifts the Plan states it is trying to achieve in respect of attracting younger buyers, and seeking a higher percentage of starter homes would be more appropriate at achieving this aim.

The Parish Council and its consultants challenge the above theoretical opinion. If people are unable to afford a property until they are well into their 30s and if the cost of buying and selling houses has increased, then what evidence is there that people are

able to buy a family-sized house as their first property? This theory lacks any supporting evidence.

It should also be noted that the recommended size mix in Lichfield district identified in the latest Housing and Economic Needs Assessment published in March 2025 (<https://www.lichfielddc.gov.uk/downloads/file/2836/housing-and-economic-needs-assessment-lichfield-and-tamworth-2025>) is broadly aligned with the evidence in the 2020 HEDNA that informed Shenstone Neighbourhood Plan Policy H1.

This mix is however further problematic. Due to the prevalence of home working many people are buying larger properties to use a spare bedroom as an office.

Housebuilders however generally prefer to sell houses with extra bedrooms rather than specific office space as this reflects better in the value of the property.

As such, a prevalence of smaller dwellings are unlikely to be attractive to the market and this will impact sale rates and deliverability. This mix is also likely to yield to high density schemes not in keeping with the character of the area, more akin to urban centres than settlements such as Shenstone.

Housebuilders generally preferring to sell larger houses with more bedrooms has not helped to address the current national housing supply crisis, particularly with affordability worsening rather than improving. Development will only be at high density if it is designed as such; it is possible to design medium density developments with predominantly smaller properties.

On the above basis, we do not believe the housing mix proposed by the NDP has been adequately justified in evidence, nor will it deliver the stated aims of the mix and finally it is likely to yield to developments which are overly dense and not appropriate for the settlements spatial character.

The above issues could however be mitigated through improvements to the second part of the policy, which allows for variation from the prescribed mix. The submitted policy only allows for variation on the basis of viability. We consider this to be overly simple, and it should allow for variation on the basis of evidence on matters such as market conditions, need, etc. This better reflects this element of negotiations between developers and Council Officers and would enable the pragmatism of officers in decision making and ensuring schemes approved are deliverable and contain settlement appropriate housing mixes which better relate to Shenstone's existing character. This better allows for applications to respond positively to updated evidence, changing circumstances and need and is better to address the Plan's aims in respect of attracting and retaining younger people.

The Parish Council and its consultant advisors believe proposed approach described above would create uncertainty as, without appropriate guidance as to how market

variations should be taken into account, there would be significant scope for inconsistency of outcomes. The policy as drafted allows the appropriate level of flexibility.

Comment id: SNDPR16

Mr Able & Mr Wylie (Fisher German)

21 May 2025

via Agent: James Beverley (Fisher German)

Please state which part of the Neighbourhood Plan (for example which section, paragraph or policy) your representation relates too:

Policy GSC3: Minimising the Environmental Impact of Development

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

Whilst we generally support this policy, concern is raised in relation to criteria D and E. Taking each in turn, starting with D, it is noted that the policy states development adjacent to the existing boundary of Shenstone must demonstrate that it “will not not have a detrimental impact on the surrounding landscape”. This is overly onerous and is in direct conflict with the NPPF which seeks more permissive policies and is antithetical to outright bans on development. Any built development would be likely to have some detrimental impact on the surrounding landscape, what is however key is the level of this harm and whether any harm arising is outweighed by the benefits of the proposed development. Almost all landscape appraisals acknowledge an element of landscape harm, thus in the terms of this policy no development would not be permissible. This is conflict with the NPPF thus fails the basic conditions The policy should be reworded to state development on the settlement edge of Shenstone should “have regard for its landscape impacts and ensure these are mitigated as far as practicable” or other words to that effect. Otherwise, this criterion would need to be deleted for compliance with the Basic Condition A.

The Parish Council and its consultant advisors disagree with the comments on criteria D. This part of the Shenstone Neighbourhood Plan policy is unchanged from the made Neighbourhood Plan 2016. Whilst the NPPF has been amended since this plan was examined, it has not materially changed in relation to these matters. The policy previously met the Basic Conditions; therefore it should meet the Basic Conditions again.

Turning to Part E of the policy, this is similar in that again the policy states that there would be no “detrimental environmental effects” of development. Whilst it clarifies that this test is specifically related to noise and air pollution and surface water flooding, this remains problematic. Again, this policy wording is not consistent with the more permissive nature of the framework in principle, but in application would likely render most developments as conflicts in policy, as most will result in some additional noise and air pollution. Surface water mitigation strategies should be designed to deliver greenfield run off (existing) or better, so this element of the policy does not add anything

to what would otherwise be required, thus conflict with NPPF Paragraph 16 F which requires policies to have a clear purpose. Almost every development would result in vehicle movements which will have an impact on noise and air pollution, however this is clearly not unacceptable and thus again the policy needs to be refined so impacts of development are weighed against the positives in accordance with the application of the planning balance in decision making. Policies which essentially amount to blanket bans on development should be removed/amended so they are consistent with the positive and permissive nature of the applicable NPPF.

The Parish Council and its consultant advisors disagree with the comments on part E of the policy as again the relevant policy wording is unchanged from the made Shenstone Neighbourhood Plan 2016.

Comment id: SNDPR17

Mr Able & Mr Wylie (Fisher German)

21 May 2025

via Agent: James Beverley (Fisher German)

Please state which part of the Neighbourhood Plan (for example which section, paragraph or policy) your representation relates to:

Policy GSC4: Wildlife Friendly Development

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

Part A of the Policy essentially reiterates the requirements of applicable BNG legislation, thus is not considered on the basis of NPPF Paragraph 16f which is clear emerging development plans should not replace policies which would otherwise be acceptable in an area.

The Parish Council and its consultant advisors disagree. Whilst the policy clause reiterates certain aspects of Biodiversity Net Gain legislation, it highlights specific matters of local importance, e.g. protecting hedgerows and mature trees and delivering BNG on site where possible.

In respect of the Criterion B, it is noted that the map shows 'wildlife corridors'. However, the policy utilises the term habitat and wildlife corridors. The policy at B states "Development proposals on or adjacent to the wildlife habitats identified within the Neighbourhood Area in Figure 7.4". It is therefore not clear if wildlife habitats and corridors are proposed to be used interchangeably, or the policy or map is labelled erroneously, however as written we do not believe the policy is capable of passing NPPF Paragraph 16 D, which requires planning policies to "be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals". This criterion of the policy is not clear, thus requires amendment or deletion.

The Parish Council and its consultant advisors consider that the wording is clear. Wildlife will move from one habitat to another; where this is along wildlife corridors, such movement should not be impeded. If the Examiner considers that the wording needs to be amended in order to make it clearer then this would be welcomed.

In respect of Criterion D of the policy, whilst the overall thrust of the policy is considered reasonable, regard should be had for the quality and health of trees when assessing the arboricultural impact of development and any necessary mitigation in accordance with best practice guidance.

This is acknowledged. The policy seeks the retention of trees of arboricultural value. If a tree is in poor health then it is unlikely to be of arboricultural value.

Commend id: SNDPR 1, 2,9,10

In respect to responses SNDPR 1, 2, 9, 10 the proposed footpath extension from the Lammas Land to Malkins Coppice the response of the Parish Council is as follows:

- (i) The proposal for a footpath was generated by the Lammas Land Management Committee who have diligently and successfully managed Malkins Coppice and existing Lammas Land footpaths for over 35 years, the proposal was endorsed by the majority of residents all the NP review consultation exercises.
- (ii) Post Covid recreational walking has flourished inside and around the village. An extension has been made to Lammas Land walking routes over the last four years as a result of resident requests.
- (iii) The proposal has been subject to formal consultation with the Malkins Coppice land owner South Staffs Water Ltd who have no objection to the proposal. They have requested only that fencing is erected as the proposed path passes the pumping station.
- (iv) The finer details of the footpath design have yet to be identified but it is recognised that the boundary of the section of the path that will run alongside the coppice will be fenced to prevent access.
- (v) The path will not give any access to the area or near the area where monthly industrial area demonstrations take place. It will be a closed loop around the edge of the coppice with access remote to the industrial area.
- (vi) The village benefits greatly from the whole Lammas Land area and experience of residential neighbour boundary complaints are negligible.
- (vii) The Lammas Land is used regularly by school children undertaking studies and this would be extended to the coppice area via a safe new footpath link.