



MATTER 6 EXAMINATION STATEMENT
CLAREMONT PLANNING ON BEHALF OF
EUROPEAN PROPERTY VENTURES
GENERAL HOUSING POLICIES



This Statement for Matter 6 General Housing Policies will seek to address the Inspector's Questions identified below:

Issue: Whether the general housing policies in the plan are positively prepared, justified, effective, consistent with national policy and the JCS.

6.2 Are the general housing policies in the plan positively prepared, justified, effective, consistent with national policy and the JCS? In some cases there are specific additional questions. In turn:

- RES3 New housing outside settlement boundaries
- RES5 New housing development
- RES13 Housing mix
 - Is the policy justified and has the effect on viability been taken into account?
- DES1 Housing space standards
 - Is the use of the standards justified and has the effect on viability been taken into account?



Matter 6 General Housing Policies

1. Introduction

1.1 Claremont Planning Consultancy Ltd (Claremont Planning) previously provided responses to the Council's emerging Local Plan on behalf of European Property Ventures Gloucestershire Ltd (EPV). The representations were in respect of the Council's approach to allocations for housing, raising concerns that the Council had not allocated sufficient sites in the emerging Local Plan to appropriately deal with housing needs. In particular, they emphasised the potential to allocate additional sites at Shurdington including the site promoted by EPV, as suitable, available and deliverable to meet Tewkesbury's housing needs.

1.2 This Statement seeks to address Question 6.2, with each of the policies to be addressed as follows:

- Policy RES3 – New Housing Outside Settlement Boundaries
- Policy RES5 – New Housing Development
- Policy RES13 – Housing Mix
- Policy DES1 – Housing Space Standards

2. Policy RES3 – New Housing Outside Settlement Boundaries

2.1 Policy RES3 as currently proposed, establishes that outside of settlement boundaries residential development will only be considered acceptable in limited circumstances. The intention is clear, in that it is seeking to direct the majority of housing growth to within existing settlements and allocations proposed within settlement boundaries, which are likely to provide the most sustainable locations for development.

2.2 However, it is considered that the proposed policy fails to provide any flexibility in terms of housing development outside settlement boundaries, should the Council need this at any time during the emerging plan period. For example, if the proposed site allocations fail to deliver as expected, and housing land supply issues arise as has been the case in recent years in the Borough including recently in the period preceding the examination of the Plan. When the Council's deliverable housing land supply falls below the five year supply required by the Framework, the restrictive approach of this policy restricts potential solutions. It is therefore considered that an additional clause could be added to this policy, to specify that in situations where the Council experiences a shortfall in housing supply, suitable sites that are located adjacent to but outside of existing settlement boundaries should be considered acceptable for housing development, subject to there being no conflict with other relevant policies of the adopted Development Plan.

2.3 By making such an addition to this policy, it would help to ensure that shortfalls in housing land supply can be addressed quickly, in an appropriate manner, helping to ensure that the Plan is consistent with national policy objectives to boost housing delivery, as well as



a representing a positively prepared strategy that will help to meet the Borough's housing needs.

3. Policy RES5 – New Housing Development

3.1 The provisions of Policy RES5 set out requirements for new housing developments that will be taken into account when considering proposals. Whilst on the whole these criteria seem reasonable, EPV has concerns with the following:

- *Where an edge of settlement site is proposed, respect the form of the settlement and its landscape setting, not appear as an unacceptable intrusion into the countryside and retain a sense of transition between the settlement and open countryside;*
- *Incorporate into the development any natural or built features on the site that are worthy of retention;*

3.2 Dealing firstly with the edge of settlement criteria, it is a concern that the Council appears to be expecting proposals for housing development not to result in a change to the landscape, in terms of its transition from built-up areas to rural landscapes. The Council has recognised through the emerging Local Plan the need to allocate growth at existing settlements in order to meet the housing needs of the Borough, which inevitably will result in changes to the edge of these existing settlements. However, the policy as currently worded seems intent to unnecessarily restrict potential developments on edge of settlement sites, which could result in the refusal to grant planning permission for development that should otherwise be supported. For example, where higher density housing is proposed in accordance with Framework's requirements to make effective use of land and in particular the requirements of Paragraph 123 of the Framework where existing or anticipated shortages of land for housing exist, policies and decisions should '*avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site*'. This may result in developments that are of higher densities than existing edge of settlement developments, however, would represent a highly sustainable and appropriate form of development.

3.3 With regards to the requirement to incorporate natural or built features on the site into developments, it is considered that the phrase 'worthy of retention' is too ambiguous and subjective to be included in a local plan policy. It is considered that this criteria conflicts with the requirement of Paragraph 16 of the Framework which requires plans to '*contain policies that are clearly written and ambiguous so it is evident how a decision maker should react to development proposals*'.

3.4 Planning policy already provides appropriate ways to protect such features for example as designated heritage assets, through tree preservation orders or recognised as ancient woodland, which would all be protected through appropriate policy and legislation that would be accounted for during the determination of planning applications. It is not considered necessary therefore to include such provision in this policy, and it is not considered appropriate to include such a measure that could be used to object to or refuse proposals that would otherwise be approved, seeking the retention of features that other qualified consultants may disagree would be 'worthy of retention'.



- 3.5 In order to ensure that the emerging Plan is found sound, it is recommended that these criteria are removed or modified in order to ensure that the policy is consistent with national policy.

4. Policy RES13 – Housing Mix

- 4.1 Whilst generally Policy RES13 has been carefully worded and includes some level of flexibility, the policy as currently drafted would appear to suggest that all new housing developments will be expected to deliver a mix of sizes, types and tenures of dwellings to meet the needs of the local area. Whilst this may be achievable on most sites, the policy should recognise that there will be circumstances where it is no appropriate or feasible to deliver the range of dwellings that may be need locally, and doing so would compromise the viability or actual delivery of the development.

- 4.2 Furthermore, the policy appears to suggest that new developments will be expected to provide self and custom build plots where demand has been identified. This again should be applied with flexibility, recognising that there will be circumstances where it is no appropriate for self and custom build plots to be provided or as specific sites may not represent appropriate or desirable locations or the types of dwellings proposed may not suit such provision, for example in the case of flatted developments.

- 4.3 As such, it is suggested that Policy RES13 should be modified in order to make it clear that whilst provision of a range of housing sizes, types and tenures and provision of custom/self-build plots is desirable and will be sought on most sites, that the Council will not seek to impose such requirements where it would compromise the delivery of viability of development.

5. Policy DES1 – Housing Space Standards

- 5.1 The Council is seeking to impose a requirement to meet the Government's nationally described space standards '*as a minimum*' on all new residential developments. However, the supporting recognises that there may be circumstances where it is not possible to achieve these standards and in such cases the benefits associated with the development would justify failure to achieve this. It is suggested that in order for the policy to be fully effective and consistent with national policy, modifications are proposed to recognise that it may not always be possible to achieve such standards although it will be expected that new developments will at least achieve this.

Word Count: 1281 words