

Matter 6 – General Housing Policies

Issue:	Whether the general housing policies in the plan are positively prepared, Justified effective, consistent with national policy and the JCS.
<u>Question</u>	
6.1	If relevant, do the general housing policies in the TBP apply to the JCS Strategic Allocations in Tewkesbury Borough? If so, are they justified and effective in the context of Gloucester or Cheltenham (as the case may be), and if not, is this clear?
<u>TBC Response</u>	
6.1.1	Upon adoption of the Tewkesbury Borough Plan (TBP), the plan will become a part of the development plan for the Tewkesbury Borough area, therefore any site (of any size) will need to comply with the Gloucester City, Cheltenham Borough and Tewkesbury Borough Joint Core Strategy (JCS), the Tewkesbury Borough Plan and any Neighbourhood Plans made that cover that area. The majority of sites allocated within the JCS are wholly or partly within Tewkesbury Borough and therefore would be subject to the policies within the TBP where relevant. In the case where a site crosses the boundary with another JCS authority, the local authorities involved will continue to work together at officer level to ensure all policy requirements are met and a sustainable development can be delivered.
6.1.2	The individual Borough Plans covering the JCS authorities must be aligned to the policies in the JCS and should not be contrary to any policy within the JCS. Therefore the general housing policies contained in the TBP can be applied to a strategic allocation (unless it is clearly stated that this should not be the case), or any site/allocation within Tewkesbury Borough, along with those policies of the JCS and enable a sustainable development of high quality design.
6.1.3	Not all of the general housing policies are relevant to the strategic allocations contained within the JCS, however the following are those which could be relevant: <ul style="list-style-type: none"> ● RES 5- New Housing Development ● RES12- Affordable Housing ● RES13- Housing Mix ● DES1- Housing Space Standards
6.1.4	Where these policies do not specifically apply to designated rural areas, they align with the policies of the JCS. In the case of RES5- New Housing Development, the requirements of this policy is generally dealt with through the site specific policy for each of the strategic allocations, with specific requirements for design and layout, scale, respect for landscape setting, requirement for open space, and requirements to retain any features found on the site as necessary, both built and natural. Therefore, this policy works in

	<p>harmony with the site specific policy of the JCS, which considers the context of the existing settlement of Gloucester or Cheltenham as appropriate to the site.</p>
	<ul style="list-style-type: none"> • RES12- Affordable Housing policy wordings specifies to what type of site the policy applies, none of which relates to the strategic allocations. • Policy RES13- Housing Mix has been informed by the same evidence that informed policy SD11 of the JCS and requires evidence at the time of the development proposal being assessed to be taken into account. This will be assessed on a site by site basis dependent on the circumstances. • DES1- Housing Space Standards, Policy F6 of the Gloucester City pre-submission plan requires new developments to meet nationally described space standards, therefore policy DES1 of the TBP is relevant to Gloucester City. Although the Cheltenham Plan does not include such a policy, they have confirmed that they are happy for the TBP policy to apply in such instances.
<u>Question</u>	
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.
<u>TBC Response</u>	
6.2.1	<p>In turn:</p> <ul style="list-style-type: none"> • RES2 Settlement boundaries (the policy that applies, the boundaries themselves are considered under Matter 3) • RES3 New housing outside settlement boundaries • RES4 New housing at other rural settlements <ul style="list-style-type: none"> ○ Is the 5% or 10 dwelling growth limit guidance justified and effective? • RES5 New housing development • RES6 Rural exception sites • RES7 Re-use of rural buildings for residential use <ul style="list-style-type: none"> ○ Should the policy refer to disused as well as redundant buildings to be consistent with NPPF para 79 (c)? • RES8 Subdivision of existing dwellings • RES9 Replacement dwellings • RES10 Alteration and extension of existing dwellings • RES11 Change of use of agricultural land to domestic garden • RES12 Affordable housing <ul style="list-style-type: none"> ○ Is the policy consistent with the NPPF, JCS Policy SD12, justified and effective? • RES13 Housing mix

	<ul style="list-style-type: none"> ○ Is the policy justified and has the effect on viability been taken into account? ● RES14 Specialist accommodation for older people ● DES1 Housing space standards <ul style="list-style-type: none"> ○ Is the use of the standards justified and has the effect on viability been taken into account?
6.2.2	<p>When considering the soundness of a Local Plan the NPPF states that the following should be taken into account:</p> <p>35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:</p> <p>(a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>(b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>(c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>(d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.</p> <p>36. These tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.</p>
6.2.3	<p>The Council believe the plan as submitted to be sound when assessed against the national criteria as stated above, this is based on the following reasons. The Policies in the TBP have been positively prepared in that the Plan seeks to meet the needs, that the JCS recognised could be met at a local level within Tewkesbury Borough, and surpasses that figure through the local plan allocations. The allocations within the TBP and its policies are aligned to the spatial strategy as identified within the JCS, supporting an economic-led mixed strategy. Furthermore the joint working between the JCS authorities has meant that needs have either been met or they will be met through plan</p>

	review, no representations have been received that require Tewkesbury Borough Council to address needs arising outside of the JCS area.												
6.2.4	The policies in the TBP have been informed by evidence prepared both for the JCS and specifically to support the development of the TBP. This has helped to ensure the policies included within the TBP are justified. The Sustainability Appraisal (CD006) has been prepared alongside the development of the TBP, which has evaluated and assessed reasonable alternatives to the policies contained within the Plan.												
6.2.5	<p>Subject specific evidence has informed the formulation of policies as appropriate; the following table shows which elements of the evidence base has supported which general housing policies:</p> <table border="1"> <thead> <tr> <th>TBP Policy</th> <th>Supporting Evidence Base</th> </tr> </thead> <tbody> <tr> <td>RES2 Settlement boundaries</td> <td>EB011 (including appendices)-JCS rural area settlement audit DP001- JCS policy SP2, specifically table SP2c</td> </tr> <tr> <td>RES3 New housing outside settlement boundaries</td> <td>EB011 (including appendices)- JCS rural area settlement audit, assesses areas that could accommodate growth, and the level at which that growth would be sustainable.</td> </tr> <tr> <td>RES4 New housing at other rural settlements</td> <td>EB011 (including appendices)- JCS rural area settlement audit, assesses areas that could accommodate growth, and the level at which that growth would be sustainable.</td> </tr> <tr> <td>RES5 New housing development</td> <td>EB001- Social, Sports and open space study EB027- BwN Standards Framework EB014- Pre-submission TBP- housing space standards background paper EB016- JCS landscape characterisation assessment + EB017,018, 019, 020, 021 as appropriate</td> </tr> <tr> <td>RES6 Rural exception sites</td> <td>EB012- SHMA EB011- JCS rural area settlement audit DP001- JCS Policy SD10 point 4</td> </tr> </tbody> </table>	TBP Policy	Supporting Evidence Base	RES2 Settlement boundaries	EB011 (including appendices)-JCS rural area settlement audit DP001- JCS policy SP2, specifically table SP2c	RES3 New housing outside settlement boundaries	EB011 (including appendices)- JCS rural area settlement audit, assesses areas that could accommodate growth, and the level at which that growth would be sustainable.	RES4 New housing at other rural settlements	EB011 (including appendices)- JCS rural area settlement audit, assesses areas that could accommodate growth, and the level at which that growth would be sustainable.	RES5 New housing development	EB001- Social, Sports and open space study EB027- BwN Standards Framework EB014- Pre-submission TBP- housing space standards background paper EB016- JCS landscape characterisation assessment + EB017,018, 019, 020, 021 as appropriate	RES6 Rural exception sites	EB012- SHMA EB011- JCS rural area settlement audit DP001- JCS Policy SD10 point 4
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	RES7 Re-use of rural buildings for residential use	The Council does not have a problem amending the policy as suggested above in order to be compliant with the NPPF EB016- JCS Landscape characterisation assessment and sensitivity analysis
	RES8 Subdivision of existing dwellings	EB012- SHMA EB011- JCS rural area settlement audit EB014- Pre-submission TBP- housing space standards background paper
	RES9 Replacement dwellings	EB012- SHMA EB011- JCS rural area settlement audit EB014- Pre-submission TBP- housing space standards background paper
	RES10 Alteration and extension of existing dwellings	EB012- SHMA EB011- JCS rural area settlement audit EB014- Pre-submission TBP- housing space standards background paper
	RES11 Change of use of agricultural land to domestic garden	Carried over from previous Plan.
	RES12 Affordable housing	EB012- SHMA
	RES13 Housing mix	EB012- SHMA
	RES14 Specialist accommodation for older people	EB012- SHMA
	DES1 Housing space standards	EB014- Pre-submission TBP- housing space standards background paper
6.2.6	All of the allocations contained within the TBP have been subject to a Sustainability Appraisal and public consultation according to the Statement of Community Involvement (CD009) to ensure they meet the tests of soundness. Furthermore, Statements of Common Ground have been prepared on a range of matters to demonstrate where possible that the policies contained within the TBP are deliverable within the plan period and can therefore be considered effective.	
6.2.7	The TBP has been prepared in a way that is consistent with national policy, having been positively prepared, based on evidence, and is considered effective. Furthermore, the policies contained within the TBP do not contradict either national policy or the JCS, but rather compliment it and add the localised level of guidance to ensure sustainable development for the area.	

6.2.8	<p>With regards to policy RES4 New housing at other rural settlements and whether the 5% or 10 dwelling growth limit guidance is justified and effective. The policy recognises that settlements not identified within the settlement hierarchy could support a small amount of development, which may help to sustain the settlement in the long-run. However, these settlements will be small, and unlikely to have the amenities within the existing settlement to support a larger development limit, otherwise they would have been identified within the settlement hierarchy.</p>
6.2.9	<p>In order to be consistent with national policy, the Council accepts that policy RES7 Re-use of rural buildings for residential use should refer to disused buildings as well as redundant buildings.</p>
6.2.10	<p>Policy RES12 Affordable housing states that affordable housing provision should be delivered “in accordance with the National Planning Policy Framework and Policy SD12 of the Joint Core Strategy to 2031”. The additional thresholds/requirements contained within RES12 addresses sites that are lower than the threshold set by policy SD12 of the JCS. There is provision for this to be done within the policy contained within the JCS which states under point 1 (iv) “Notwithstanding the above, affordable housing policy for sites of 10 dwellings or less may be applied under policies set out within District plans”.</p>
6.2.11	<p>NPPF paragraph 63, allows for a lower threshold to be set for designated rural areas, to which point one of policy RES12 specifically relates.</p>
6.2.12	<p>The Sustainability Appraisal (CD006) specifically looked at this policy to support the pre-submission stage of the plan and found the increased requirement for affordable housing on the lower threshold to have a major positive effect in terms of meeting objective 1 of the Integrated Appraisal, which relates to housing, and specifically “ensuring everyone has access to a decent home that they can afford and meets their needs” (CD006, pg. 13). This would suggest the policy is justified and effective.</p>
6.2.13	<p>The requirements of Policy RES13 Housing mix will be considered on a case by case basis, and will take into account viability of the scheme being proposed at that time, as stated within the policy. The policy was assessed through the sustainability integrated appraisal which found that this policy alongside policies RES12, 14, 15 and 16 would “have positive effects by providing a mixture of housing tenures to benefit all members of the community” (CD006, pg. 79), when assessed against objective 1 of the Integrated Appraisal. Furthermore, the policy when implemented will require the proposal to be assessed against the latest evidence of housing need, ensuring that the most up to date needs are taken into account at that time.</p>
6.2.14	<p>Policy DES1 Housing Space Standards has been based on evidence, specifically the evidence presented in EB014- Pre-Submission TBP- housing space</p>

	standards background paper. The Council has carried out research across a range of sites, differing in size, location, and type (i.e. housing mix) that have been permitted since the introduction of the nationally described space standards, and found that 41% of the dwellings surveyed fell below the nationally described space standards. The Council's inclusion of this policy has been strengthened by national research undertaken in 2011 by RIBA which demonstrates how increased space standards can have a big impact on lifestyle, and how a decreased space standard can have the opposite effect.
6.2.15	To demonstrate the impact of adopting the nationally described space standards (NDSS) on the viability of development in Tewkesbury Borough, the Council commissioned Porter Planning Economics Ltd (PorterPE) with Three Dragons to carry out a whole plan economic viability assessment (Tewkesbury Borough Plan Viability Assessment, September 2019). This provides robust evidence that the cumulative planning policy requirements within the plan do not threaten the development viability of the Tewkesbury Borough Plan as a whole. The development assumptions used within the viability assessment include the NDSS. The viability assessment therefore considers whether housing developments in the borough designed to meet the NDSS will be able to provide CIL/S106 contributions and achieve all of the Development Plan's other planning policy requirements and remain viable.
6.2.16	The viability assessment finds that the majority of the tested typologies (designed to the NDSS) would be able to come forward under the cumulative full policy requirements of the JCS and Pre- submission TBP (including CIL and S106). This includes the majority of the housing site allocations in the Pre-submission TBP and windfall developments on greenfield sites in the high and mid value areas. There will be a number of site typologies that are likely to be less able to afford the additional policies within the Pre-submission TBP without being placed at risk of non-delivery. These relate mainly to developments in the lower value areas of the Borough. These do however represent a minority of cases and it is important to note that there is sufficient flexibility within the wording of the respective policies within the Pre-submission TBP, and also the JCS through Policy INF7, to enable a departure from policy where viability presents as an issue through a site specific viability assessment. On this basis it can be concluded that adopting the NDSS through Policy DES1 would not have an adverse impact on development viability in Tewkesbury Borough and act as a hindrance to delivery.
6.2.17	The justification of the national space standards (NDSS) is set out in the Space Standards Background Paper (Examination Document EB014) and further in the Tewkesbury Borough Plan Viability Assessment).

