

SHIPSTON-ON-STOUR NEIGHBOURHOOD PLAN 2016 - 2031

INFORMAL PRE-SUBMISSION HEALTH CHECK – JULY 2017

Introduction

1. I refer to the latest draft of the above Plan accompanying the email from Stephen Miles of 3 July 2017.
2. I note the references to the previous meetings and discussions, especially the meeting held on 8 March 2017.
3. I welcome the further progress made with the preparation of the Plan. Nevertheless, it remains the case that the Plan – covering, as it does, the largest settlement in the south of the District – will have important implications for the affordable housing development programme of the District Council as well as the corresponding business plans and investment decisions of the Council's partner housing associations. With this in mind careful scrutiny is important – and seeking to act as a "critical friend" in this respect – I would strongly encourage the Town Council to give careful consideration to the informal comments below before proceeding to submission stage.

Policy HSG1 – Ensuring a supply of affordable rental and shared equity homes

4. My understanding is this policy would relate to development proposals exclusively of affordable homes on 'appropriate sites' within the built-up area boundary.
5. I welcome the intent of the Policy and have no concerns about its substance. However, for it to be workable, the 'built up area boundary' does actually need to be defined – see further comments below.
6. Also, I would simply highlight my concern that the Policy is unlikely to create much "added value" in terms of additional affordable housing schemes coming forward on account of other factors.

Policy HSG2 – Ensuring a supply of low cost market housing

7. The Policy supports relevant proposals on 'suitable sites' where such schemes 'include' low cost market housing.
8. To be workable the Policy:
 - a. Needs to be clear what is meant by the term 'suitable sites'. For example, does this include sites outside the built-up area boundary (however defined)?
 - b. Needs to be clear about the use of the term 'include'. Does this mean that schemes need only include a proportion of 'low cost market housing'? If so, what proportion and what other forms of housing would be acceptable or required?

Policy HSG3 – Meeting the needs of older persons

9. My previous comments still apply, and I strongly recommend this Policy is redrafted. I still fear this is unworkable in its current form.

Policy HGS 4 – Development on windfall sites

10. I support the inclusion of this Policy. However, it is essential that the term ‘built up area boundary’ is defined.

Policy HGS5 – Safeguarding committed sites

11. I support this Policy, although I think there is some realism needed about its likely effectiveness.

Policy HSG6 – Allocating housing land to contribute to strategic housing requirements from 2021 onward

12. Whilst the intent of this Policy is welcome, it is, unfortunately, unworkable and confusing in its present form. It urgently needs redrafting.

13. The Policy title refers to meeting strategic housing requirements from 2021 onwards and the Objective refers to the identification and allocation of ‘adequate reserved provision’. Apart from the obvious fact that the site itself is not identified – which limits my ability to make informed comment (see also below) – it refers to the site being ‘allocated for development from 2012 onwards. Whilst the date itself may be a typo, I am more concerned that its wording undermines its function.

14. Could I suggest the following alternative:

“About [xxx] hectares of land with an estimated capacity of between 25 to 30 dwellings at [insert site location, as shown on the Policies Map] is safeguarded as a reserve housing site. It will be released for residential development in the event of the earlier of the following trigger events occurring:

- (a) A community-led housing scheme is brought forward as an alternative to the site allocated in accordance with Policy HSG7, or
- (b) A scheme providing plots for exclusively custom and self-building build housing and which meets the criteria for regulating its development as set out in Policy HSG8 is brought forward, or
- (c) Its release, after 2021, is required to meet the requirements set out in Part D of Core Strategy Policy CS.16.”

15. The Town Council should also consider specifying any appropriate site-specific development requirements.

16. The above approach would have the benefits of:

- (a) Introducing greater clarity about the status of the site and the circumstances that would trigger its release, and
- (b) Introduce greater flexibility for the earlier release of the site for a community-led housing scheme if it were to become apparent that a scheme on the site identified in Policy HSG7 is unlikely to materialise.
- (c) As an alternative, allow for an exclusively custom/self-build housing scheme to come forward (see also comments on Policy HSG8 below).

17. I must reserve the right to comment further once the exact location of the site is disclosed.

Policy HSG7 – Allocating housing land to meet currently identified local needs

18. The site in question is not identified (see also below) which obviously limits my ability to make informed comment. Nevertheless, I am pleased to note that the proposed approach reflects my earlier advice. I therefore support the proposal in principle but would suggest some minor amendments to the wording are needed. Could I therefore propose the following:

“About [xxx] hectares of land with an estimated capacity of about 18 dwellings at [insert site location, as shown on the Policies Map] is allocated for a community-led housing scheme to meet currently identified local housing need.”

19. The Town Council may also wish to consider specifying any appropriate site-specific development requirements.

20. The wording suggested above would introduce greater clarity about its purpose and allow for greater flexibility over the exact stock and tenure profile.

21. As suggested above in relation to Policy HSG6, it may be prudent to identify an alternative site on which a community-led scheme could be brought forward in the event that a scheme on this site cannot proceed for any reason.

22. I must reserve the right to comment further once the exact location of the site is disclosed.

Policy HSG8 – Encouraging custom and self-build housing opportunities

23. I note the expressed wish of the local community to include a policy of this nature and the underlying intent. However, on the basis that it would only be enforced in relation to schemes for 20 or more dwellings within the built-up area boundary of the town, and no sites of this size are actually identified, I think some realism is needed about its likely effectiveness. That said, it could perhaps be made more effective by being coupled with a re-drafted Policy HSG6, as described above.

Policies Map

24. The Policies Map, on page 41, has not been updated to reflect either previous comments or the latest suite of policies (especially those concerning housing). As noted above, this hinders my ability to make informed comment. It needs updating as a matter of urgency.

John Gordon
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10 July 2017