

Eden District Council EIP Issues and Questions Response on behalf of Story Homes 23995/A3/DM Statement L

Policy HS2 1 Statement L Policy HS2 – Housing to meet local demand is the policy justified and effective?

1.0 Is the policy sufficiently flexible to facilitate the construction of 360 dwellings within the Small Villages and Hamlets?

- 1.1 No, as set out in our response to Policy LS2. The criteria listed in Policy HS2 conflicts with both Policies LS1 and LS2. Policy LS1 seeks to allow development where it reuses previously developed land, and where it delivers new housing on greenfield sites to meet local demand. It states that it must be of a high quality design and will be restricted to infill sites or rounding off existing development.
- 1.2 Policy HS2 conflicts with Policies LS1 and LS2 as it introduces additional criteria which includes that development is restricted to infilling and rounding off the current village settlement pattern, the building does not contain more than 150 sqm gross internal floorspace, and a condition or legal agreement restricting occupancy to only those meeting local connection criteria.
- 1.3 The policy hinders development further and will restrict the amount of development which is able to come forward. This is on the basis that there is no evidence to suggest that a blanket threshold of 150 sqm gross internal floorspace is acceptable, and a local occupancy cause. This is despite Policies LS1 and LS2 referring to “local demand” only which is not defined. It is considered that the criteria in Policy LS2 and its relationship with Policy HS2 is unsound on this basis. Additionally, the supportive text appears to focus on the self-build, however, this is not reflected within the policy wording itself. The policy in its current form places a significant restriction on delivery and is not consistent with Policy LS1. Clarification is also required on what is considered to be “small-scale”.

2.0 How is “infilling” and “rounding off” to be defined?

- 2.1 Infilling and rounding off is poorly defined within the policy and supporting text, and refers to the current village settlement pattern. Further clarification is required from the Council’s as to whether it is proposed that the current village settlements are to be retained and the extent of infilling and rounding off. 3.0 What is the justification for the 150m2 limit on dwelling size?
- 3.1 As set out in our response to point 1 of this response, there is no justification provided in relation to the 150 sqm threshold, and there is no policy justification to suggest that a blanket threshold should be applied, nor is any reference made in the supporting text to this limit. The policy is therefore considered to be unsound on this basis.

4.0 Is the local connection criteria justified?

- 4.1 Whilst we understand the desire for the Council to support those in rural areas, there is no policy basis for this in the Framework, and it does not place restrictions on occupancy. Guidance states that all settlements should play a role in contributing towards sustainable development. This is reaffirmed in the document "Towards a One Nation Economy" which seeks to boost the productivity of rural areas and sets out that new housing in rural areas should provide for inward migration as well as meeting the needs of those living there. A policy setting out local connections only, is not considered to be warranted and cannot be found sound. It is inconsistent [and contrary] to the Council's objective to attract more people of a younger age and encourage economically active migrants.
- 4.2 It is not considered to be viable, particularly as local occupancy can decrease the value of the properties. Furthermore, whilst the Council have stated that local occupancy restrictions do not apply for previously developed land, due to the higher costs associated with developing the sites and the opportunities they bring for the villages, it is unclear why this should be different. The Council's justification that this could be met by Starter Homes, rather than a local occupancy/connection is unsubstantiated.

Summary

Is the Policy Justified and Effective?

The Policy is unsound on the basis that it introduces a threshold of 150 sqm which a local connection criteria which has not been justified. On this basis it is not considered to be positively prepared or justified. The policy as drafted is inconsistent with Policy LS1.

To be found sound, the removal of the local connection criteria is required, and removal of the 150 sqm limit. Definition of the policy is required. It is unclear at this time which policy (LS1 or HS2) is correct.