

Interim Housing Supply Policy

Draft for consultation



Planning Policy Team
IHSP consultation
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Public consultation questionnaire

Please return this form by email if possible, to arrive by 4:00pm 25 November 2011.

Please email the address above for a copy of questionnaire in electronic form.

A. Your contact details

Contact name Andy England	Organisation (if applicable) Chair, Ashbury Parish Council	Telephone 01793 710137	Email andy@crosstrees.co.uk	Mobile
Address for correspondence 1, Cross Trees, Ashbury, Swindon				Post code SN6 8LR

B. Are you promoting or looking to promote a particular site or sites for housing development?

No

If YES please indicate the site area hectares

And the name of the host or nearest town or village

C. Do you intend to submit a request for a site screening opinion for possible interim policy consideration (form at IHSP annex C)?

No

Consultation Questions

Continue on an additional sheet if necessary

1. The council should relax selected local plan policies to improve housing supply

Strongly agree	Agree	Neutral or unsure	Disagree	Strongly disagree X
<p>Reasons/comments.</p> <p>Relaxing policies H11, H12, H13 and GS2 will have a long-lasting, detrimental effect on villages in the Vale. Allowing development on sites outside current settlement boundaries, the need to hit 2026 housing targets by March 31st 2014 and the relaxing of the limit on development sizes will lead to large developments that small communities will struggle to accommodate in such short timescales. The IHSP makes it much harder for villages to grow by developing smaller numbers of houses in a number of separate sites where the impact on existing residents, infrastructure and facilities can be assessed carefully. Relaxing these policies will lead to developments that have a disproportionate impact on specific parts of the community; the impacts are much more likely to be negative and unsustainable.</p> <p>A recent survey in Ashbury Parish indicates that local residents support an increase in the number of houses in the community. However, residents want developments that meet the needs of local people, are chosen carefully with full local involvement, are sustainable (in their own terms), and will not dramatically change the nature of the village they have chosen to live in. A village's character is highly valued by its residents, relaxing these policies (and the IHSP in general), poses a significant threat to that.</p> <p>The original policies were introduced specifically to avoid the situation that our parish is facing –large, uncontrolled developments in small communities. Relaxing them now and forcing Ashbury to accommodate 15 years of housing growth in 2 years is irresponsible.</p> <p>The IHSP goes against the government's stated principle to put more control in the hands of local people. Not including sufficient controls in the IHSP to ensure that the needs of local residents are understood and incorporated in development proposals is deeply unpopular.</p> <p>Ashbury Parish is undertaking a survey that will help to identify the housing requirements of the villages within the parish. The IHSP, and the proposed timescales for introducing it, do not allow this process to complete and so does not allow the needs of local people to be understood or taken into account.</p> <p>There is deep mistrust in the villages of the motives of the planning committee and the council as a whole in forcing through the IHSP.</p> <p>The IHSP is a badly-thought-out policy which smacks of panic. It is a knee jerk response to targets imposed by an often discredited and now disbanded Regional Authority in a time of perceived economic boom. It is the wrong answer to a now changed situation.</p>				

2. To boost housing completions and improve the five year housing land supply it is important that housing sites brought forward by the interim policy are capable of delivering homes quickly.

Strongly agree	Agree	Neutral or unsure	Disagree	Strongly disagree X
<p>Reasons/comments. From a recent questionnaire, completed by local residents in Ashbury Parish, it is clear that the most important factors when considering new developments should be that they meet the housing needs of local people, will not have a significant negative impact on the local community, are carefully considered and will not adversely change the nature of the village. To focus so heavily on speed of delivery is irresponsible, pointless and highly unpopular.</p>				

3. Bringing forward a number of smaller sites is more likely to improve short to medium term housing delivery than bringing forward additional large sites (200+ homes).

Strongly agree	Agree	Neutral or unsure	Disagree	Strongly disagree X
<p>Reasons/comments. Relying on a large number of smaller developments to deliver sufficient housing of the type that is required to ease housing problems in the Vale is likely to fail. The housing needs of the Vale in the next two years are likely to be very different to the needs of small villages over 15 years. Housing developers see developments in small villages as highly desirable because they tend to have a higher proportion of more expensive housing that maximises the returns on sought-after land in short supply. This is not the type of housing that the Vale needs in the next two years.</p> <p>Housing sites that can deliver the type and number of houses the Vale actually needs have already been identified in the Vale. The Vale District Council should focus on overcoming the barriers that are preventing developments being taken forward on those sites at the required rate.</p> <p>The Vale District Council has gone from one extreme to the other – taking focus away from large development sites and focussing instead on small villages. Large towns, which may well provide significant development opportunities, including opportunities on brown-field sites, that could meet the housing needs of the Vale, have been excluded from the IHSP. This is a decision that is very difficult to understand or justify.</p> <p>Views expressed by local residents in a public meeting held to discuss the IHSP show that there is a very real feeling in the parish that the Vale District Council is “bullying” local communities as they are likely to offer the least resistance. This approach is deeply unpopular and undermines the trust that our community has in their elected and non-elected representatives in the Vale.</p>				

4. Large/strategic housing sites (200+ homes) should be tested and allocated through the core strategy process and not considered under the IHSP.

Strongly agree	Agree	Neutral or unsure	Disagree	Strongly disagree X
<p>Reasons/comments. The IHSP should consider housing of all types. Anything else presents a distorted picture, is an incomplete strategy and is likely to result in solutions that neither meet the housing needs of the Vale nor the requirements of the smallest and most vulnerable communities that the District Council represents.</p>				

5. As a general principle, ‘proportionate growth’¹ should be broadly sustainable in that it would help settlements sustain their current level of facilities and services by stabilising their population, without unduly adding to pressures on services and infrastructure over the emerging core strategy period

Strongly agree	Agree	Neutral or unsure	Disagree	Poorly worded Question: X
Reasons/comments.				
<p>Copied from above: A recent survey in Ashbury Parish indicates that the parish supports an increase in the number of houses in the community. However, residents want developments that meet the needs of local people, are chosen carefully with full local involvement, will not adversely affect local amenities and infrastructure, and will not dramatically change the nature of the village they have chosen to live in.</p>				
5(a). If you disagree, what additional or alternative tests or indicators of sustainability do you suggest be applied?				
<p>Sites should be “sustainable” if:</p> <ul style="list-style-type: none"> • The housing needs of local people have been clearly identified – based on actual surveys of the requirements of residents, schools and businesses in the village and not based purely on mathematical formulae. • Surveys of potential sites are carried out to ensure developments will not have adverse affects on neighbouring residents, infrastructure and the character of villages. This should include the number of houses a site can accommodate. • Housing targets are chosen based on the requirements and limitations identified in the local housing surveys and on existing village facilities. • Developments meet the needs identified in the surveys and are not just chosen on a first-come-first-served basis. <p>Developments should not be rushed through simply to meet housing targets; doing so without fully understanding the housing needs of the local area is irresponsible.</p> <p>There is a need for more affordable houses in the Vale, both open market and ‘housing association’ type. The IHSP will not deliver the former in a village environment in more than tiny numbers, as there is no profit for the developers in building more than the minimum numbers the rules allow.</p> <p>Experience in Ashbury has shown that new, mainly large houses bring in not families, but older, often retired couples from London or other cities where house prices are higher. The argument that development will of itself invigorate communities is not proven here. If the Vale is serious about providing private housing for smaller families, such as single-parent and elderly single-person private houses, again the requirement is for smaller properties or perhaps specially designed accommodation.</p>				

6. Proposals that significantly exceed the host settlement’s identified level of proportionate growth should be screened out from the interim policy approach and instead considered through the formal plan-making process.

Strongly agree X	Agree	Neutral or unsure	Disagree	Strongly disagree
Reasons/comments.				
<p>This question assumes agreement with the IHSP, which is not the case in our parish.</p> <p>Ashbury Parish objects to the relaxing of housing policies and the introduction of the IHSP, particularly the aspects of the IHSP that will force the parish to accommodate 15yrs of housing growth in 2 yrs.</p>				

¹ For IHSP purposes this is defined in the context of declining average household size, as: the level of housing provision sufficient to maintain at 2026 the 2011 settlement population, at the average Vale household size projected for 2026.

6(a). If you disagree, what additional tests or considerations might be applied to justify exceeding the level of proportionate growth?

7. What are your views on the policy relaxations proposed?

Object	Policies H11, H12 and H13, relaxation to the size thresholds currently permitted on sites within the built up area of towns and villages
Object	Policy GS2, relaxation to consider housing on sites outside but abutting the defined settlement boundary of the towns or the built up area of the larger and smaller villages which are not located within the Green Belt
Support	Policies E11, E12, E14, relaxation to consider housing on currently vacant, former employment sites within or adjoining a settlement

Reasons/comments.

Relaxing the policies without putting in place other safeguards that specifically ensure developments are appropriate, meet the needs of local people, will not adversely affect local infrastructure and will not dramatically change the character of the settlement is irresponsible.

The only justification for not introducing other safeguards appears to be time-based – the desire to approve and begin developments quickly. This approach is morally wrong.

Proposed sites should be considered on their individual merits and not on whether they meet centrally defined housing targets.

Relaxing the policies may be temporary, but the impact on local villages will be permanent. It would be reckless and undemocratic to force through this proposal based only on the minimum necessary level of consultation with the people most affected by it. The proposal will lead to decisions about housing being made by land-owners and developers, not by local communities or the electorate.

A recent survey of village opinion shows a willingness to accept organic growth but the front-loading of ‘deliverability’ is unwelcome and likely to be resented. It makes no sense in the context of this community and is in direct contradiction of what residents understood by “Localism”.

The VWHDC has developed, over many years, a planning policy to protect the integrity of the villages and their environment without preserving them in suspended time. What purpose does it serve to have such a policy if it is only in place when there is no pressure upon it? This is the time to argue the more fiercely for its continuance.

Copied from above:
 Relaxing policies H11, H12, H13 and GS2 will have a huge and long-lasting effect on villages. Allowing development on sites outside current settlement boundaries, the need to hit 2026 housing targets by March 31st 2014 and the relaxing of the limit on development sizes will lead to large developments that small communities will struggle to accommodate in such short timescales. Rather than allowing villages to grow by developing smaller numbers of houses in a number of separate sites where the impact on existing residents, infrastructure and facilities can be assessed carefully. Relaxing these policies will lead to developments that have a disproportionate impact on specific parts of the community; as a result, the impacts are much more likely to be negative and unsustainable.

7(a). Are there any other saved Vale Local Plan policies that should be considered for relaxation?

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8. The proposed policy relaxation to enable some edge-of-settlement development would not apply when the settlement edge is located in the Green Belt. Should the same restriction be applied to edge of settlement land designated AONB?

Strongly agree X	Agree	Neutral or unsure	Disagree	Strongly disagree
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Reasons/comments.
AONB must be protected in the same way as Green Belt land. AONB are as important to small villages as green belt land is to larger towns and cities. To suggest otherwise, indicates a clear lack of understanding of villages.

9. How could the IHSP be improved?

Any other comments?

- H11, H12, H13 and GS2 must not be summarily removed (a more accurate term for the proposals than “relaxed”).
- IHSP must include larger towns, not just villages. Excluding towns excludes significant numbers of development opportunities that are more likely to meet the Vale’s housing needs.
- IHSP must include proposals/actions taken to overcome the barriers slowing down developments in the Vale’s 4 large development sites – including splitting the sites into smaller developments. Not including this in the IHSP presents an incomplete picture housing development in the Vale.
- Increased safeguards must be introduced to protect villages if the policies are relaxed.
- Remove the March 31st 2014 time limit – the focus on delivering by arbitrary dates is morally unjustifiable.
- Increase local involvement in the screening process – local involvement is not sufficiently considered in the IHSP. Our survey has shown that villages aren’t opposed to any change (as was often quoted to me by housing professionals at the Vale’s recent consultation meeting). The Vale should trust village residents, involve them and work with them to deliver what’s right for the village.
- The focus in the IHSP should be on what housing small communities actually need, not an arbitrary figure defined centrally.
- Developers, if they want to build outside existing policies, should be required to identify a local need and deliver to that.
- The IHSP promotes first-come-first-served developments. The clauses that promote this should be removed. Focus should be on the best development(s) for the village.

Local residents at a public meeting in Ashbury Parish made the following comments about the IHSP. They reflect the overwhelming majority of the views expressed

My initial reaction was to say “No” to everything, not because I felt strongly either way about having more houses built in the village, but as a reaction to the new planning scheme and it’s quite obviously is ill thought out and rushed through. It’s almost to a point where you can’t help but think there’s a hidden agenda in the way it appears to be rushed and managed. There’s me thinking we lived in a democracy.

As the Parish Council are currently putting together a draft Neighbourhood plan, I feel the timing of the IHSP is ill-conceived and is a knee-jerk reaction from the VWHDC. It does feel that, despite the wording of the policy document, the IHSP flies in the face of the ‘local’ aspect of the Localism Bill.

Adding more homes, affordable or otherwise to the village, could very well be the panacea that the parish needs, but without time and the considered consultation needed, it is unlikely.

I strongly object to the IHSP being implemented in any form until such time that the Parish Council have formulated and agreed the Neighbourhood plan. In considering any plans for the expansion of the village it has to be hand-in-hand with the Neighbourhood plan, and with the full backing of the community and not a developer or a district council who are in a rush to keep profits and targets on schedule.

Ashbury has enough larger houses at present. Affordable smaller houses are needed. The existing planning allocates only 40% affordable and thus should be amended in the IHSP to say 70%

I am strongly opposed to the Vale’s IHSP as I believe that it is a panicked response to the failure of their previous strategic plan to concentrate house building in the large centres of population due to the recession that is restricting house-buying.

By completely reversing their long-term policy and instead demanding that villages bear the impact of new house building they are choosing what they believe to be the path of least resistance and, by limiting the time that local people and parish councils have to respond to what is supposed to be a proposal, means that they are treating us with contempt.

Once land is built on it is lost forever and this knee-jerk response is totally at odds with the principles of the Localism bill whereby local planning authorities set a vision, in consultation with local people, about what their area should look like in the future. The consultation the Vale is indulging in is cursory at best and does not in any way adhere to the requirements of the bill.

I think the Vale should stop now and properly listen to what local people and parish councils are saying, spend time discussing the results of real consultation.

Am appalled at the way in which the IHSP has been rushed with minimum opportunity for consultation. Effort should be spent resolving the issues for building in the towns, not green-field sites.

*Ashbury is a **small** village with fewer facilities than when its size was first assessed. If houses are to be built, the number should more realistically reflect its small-village status.*

Abolition of the GS2 boundary clause opens the floodgates for numerous developments and ultimately destroys the village's compact and unique character. A death knell for rural life.

There should be a full survey to identify suitable sites in towns as well as villages; developments should be based on local need not proportionate growth. Developments should be organic over a number of years in order to be sustainable. Large developments will have a hugely negative impact upon the local community, the character of a village and the surrounding landscape.

Policies H11, H12, H13 and GS2 should not be relaxed. Development in villages should be small (less than 5) with an emphasis on affordable housing for local people. Development to be organic over a number of years, to be sustainable and distributed over whole of the parish.

- Thank you for participating -