

## EN/D Housing Infill etc HN6 and 7

### Background: TNP Policies for housing infill etc. and Comment made on Pre-Sub

In their criticism of HN6 and HN7 SDNPA make a number of detailed points which required TNP to re-examine both policies.

In their comments on HN6, SDNPA noted the complexity of the policy and the uncertainty created by reference to plots in excess of 0.1 ha and below 0.1, both of which have similar policies. SDNPA offered help in the redrafting of HN6. We have tried to take them up on this but as no officer was available, were advised that it might not be the best way forward (too many cooks). TPC have reviewed policy HN6 in general and have simplified it.

The SDNPA points are dealt with in detail in TPC's responses to their comments.

### The 30% issues

What remains is the 30% limit in the increase in the size of houses whether by extension or redevelopment. Both TNP Policies HN 6 and HN7 impose the 30 % limit on all extensions and new houses and considered that it was able to follow SDLP SD 30 and 31 in doing so. SDNPA comment that TNP6 has misinterpreted SD 30 (Replacement dwellings) as this applies only outside the settlement boundary.

TPC have looked again at HN6 and HN 7 in relation to SD 30 and 31;

SD 30 applies only outside the settlement boundary and only to the redevelopment of house plots, not to their extension.

It is further explained by para 7.84 which says:

*The purpose of the policy is to reduce the loss of small homes in the National Park through replacement by substantially larger homes.*

The small dwelling is defined in 7.89 as having a "GIA of 120msq or less"

The landscape impact is also a key consideration. (7.84)

SD 31 deals with extensions both inside and outside the settlement boundary; it does not deal with replacement. The text of the Policy which is in BOLD applies the 30 % limit on extensions to all dwellings. However the supplementary text says:

*7.91 The purpose of this policy is to avoid the over-extension of existing dwellings and the adverse impact that has on the character and appearance of both settlements and the countryside. This Policy is consistent with policy SD 27 Mix of homes and seeks to protect the limited supply of small and medium -sized homes in the National Park.*

No guidance is given on the size of "small and medium sized homes" although in the supporting text of SD 30 a small dwelling is defined as 120m sq or less. The SDLP's Technical Advice Note (TAN) uses 120 sq m as the limit to be applied to both small and medium sized homes and this is the policy being applied on SDNPA's behalf by WCC.

TAN also includes the following statement on page 9:

*There is purposefully no policy distinction between small/medium and 'large' dwellings insofar as relates to the 30% limit. This is because whilst extensions on 'large' existing dwellings are not likely to*

*impact on the existing supply of small/medium dwellings, they are more likely to have an adverse impact on character and appearance. The policy is written to achieve both these objectives.*

On the basis of the limited statement in SDLP in SD 31 and the further advice in SDLP's TAN, TPC understand that SDLPA is now applying the 30% rule to extensions both inside and outside the Settlement Boundary but only to houses of 120 m sq or less.

This is not what TPC intend and have set out in the Pre-sub plan. This is not a matter which SDNPA have highlighted but is one which TPC have identified after further consideration of the matter.

#### How does SD 31 and the TAN constrain TNP?

SD 31 is a Development Management policy so TNP is not bound to follow it. Chris Paterson's advice is:

"I think Twyford should progress with the policy they are most comfortable with on this one. SD31 is not a strategic policy so the TNP can deviate from what they were attempting to achieve. I completely understand what you are trying to do, restrict the expansion of all dwellings to very large dwellings which would be unaffordable to most. I think our DM colleagues were concerned that this policy was very prescriptive and quite complex, therefore could lead to issues with different officers interpreting in different ways. So our advice was to simplify as we said in our comments. I don't think our DM colleagues are going to offer you something which you think will do the job, and policy writing by committee will inevitably lead to something quite complex or undeliverable! I think if you progress with your policy as stated you just need to be prepared for an examiner to simplify it, but in consultation with you, to ensure the intention of the policy is met."

TPC also consider that, as guidance to TNP, the SDLP 31:

- is unclear in failing to distinguish small and medium sized homes
- is not consistent with SD 27 Mix of Homes which is justified on the basis of a wider range of housing types/sizes
- fails to consider the impact on affordability of the type of extensions which have occurred in Twyford over the last 10 years of so
- fails to examine the effectiveness of the similar WCC small dwellings policy which was in place for many years before.
- Is unfair in targeting the less well off who are the main ones caught by this policy.
- Does not fully address the cumulative impact of large extensions on either the appearance of the Parish on the one hand and its social structure on the other.

#### Can TNP's HN6 policy cover ALL extensions?

It was TPC's intention that all extensions were to be limited to 30%, as in the New Forest NP; TPC considered it had reasonable grounds for concluding that it was able to rely on SD 31 to achieve this and that its supporting text to HN6 explained its approach. TPC note that no comment on the TNP in respect of the 30% Policy were submitted by any of those responding to the Pre- Sub, other than the SDNPA's in respect of SD 30, either for clarification or in objection or support; so it was not a matter of great concern to respondents.

However TPC agrees that TNP position on extensions both inside and outside the Settlement boundary does require clarification for these reasons:

- the policy text of SD 31 which appears to apply to all housing

- The inclusion of “ small and medium sized homes” without any separate definition of “medium”
- The triple justification for SD 32 of keeping small homes; landscape impact; and impact on character.
- TNP supporting text wrongly identifies SD 35 (Employment Land) and SD 30 as applying to extensions but does not mention SD 31.

Since the closure of the Pre-sub publicity TNP have had:

- The Highcroft (Love Lane) case, in which houses well in excess of 30% were proposed outside the settlement boundary but were not objected to by the Planning Authority because the original dwelling was in excess of 120m sq
- Further local comment on the individual and cumulative impact of recent major extensions and rebuilds on village character

So TPC must firstly clarify the wording of HN 6 and is now able to explain more fully why the SD 31 extensions policy should be extended both to the whole of the Parish and to all dwellings regardless of size.

This will be duly publicised for further comment at the Submission stage of the TNP.

#### Action

1. Clarify correct and amend the Pre-sub policy and text for both HN6 and HN7
2. Renumber HN 6 to HN 5 and HN 7 to HN6

12 Sept 2020