

**TVBC LOCAL PLAN REGULATION 18 PART 2 SUBMISSION on behalf of
Stratland Estates Ltd**

Land at Danes Road, Awbridge

SHELAA site 101

Objections to:

SUSTAINABILITY APPRAISAL

POLICY SS1 Settlement hierarchy

POLICY SS6 Meeting the housing requirement

Proposals map

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Summary of objections

1. Sustainability Appraisal and Site Selection Process

- The assessment of the land at Danes Road, Awbridge (site 101) has been unreasonably curtailed at Stage 4 of the appraisal process due to the housing appraisal concluding that sites adjacent to Tier 3 settlements will not be taken forward. This is considered to be an arbitrary decision which immediately excludes large areas of the Borough, including sustainable settlements from any housing allocations, **Objection**
- In Tier 3 settlements, no allocations are proposed apart from those that come forward as community schemes or through a neighbourhood plan process. There is limited justification to demonstrate that this approach will deliver the necessary housing in rural areas where high levels of housing need are apparent. **Objection.**

2. Spatial Strategy

- Policy SS1 Settlement Hierarchy. The proposed settlement hierarchy is the cornerstone of TVBC's approach to delivering its spatial strategy and sustainable development. The decision to exclude any allocations outside Tier 1 and 2 settlements has not been justified in the SA or the LP and will mean that there will be little housing delivery in rural settlement where there is often high levels of housing need. **Objection**

3. Housing Distribution

- Policy SS6 Meeting the Housing Requirement. The delivery of the housing requirement in the LP relies upon a small number of large sites which is not consistent with the advice in the NPPF (2023) paragraph 70 in terms of providing a range and choice of sites. In particular the need to provide at least 10% of housing requirement on sites that are no larger than 1 ha. **Objection.**
- Policy SS6 Meeting the Housing Requirement. The Plan should be amended to include the land at Danes Road for housing. **Objection.**

4. Proposals Map.

- The omission of SHELAA 101 as an allocated site should be rectified. **Objection**

Background

The site at Danes Road is immediately adjacent to the defined settlement of Awbridge, a Tier 3 settlement in the LP. It is close to the main amenities of the village and located on a good access road. The site would make a good option for a limited development adjacent to the village and would help the LPA achieve 10% of its housing requirement on smaller sites as required by the NPPF.

The housing sites appraisal process and the spatial strategy of the LP have made a strategic decision that development in the Borough will be focussed on the Tier 1 and Tier 2 settlements. The previous stage 1 consultation showed some support for growth in rural areas, but the current proposals have refined this so that only neighbourhood plans or community led schemes will be considered. It is considered that the decision to exclude allocations in Tier 3 settlement has not been adequately justified

Awbridge is in the process of preparing a NP but the draft plan has yet to be published. The NP will apparently be seeking to provide for 10 houses over the LP plan period, so it is feasible the Danes Road site will be considered. Nevertheless,

without some certainty on progress of the NP it is considered that the LP should make appropriate allocations in Tier 3 settlements.