Isles of Scilly Local Plan: Public Examination Matter 2 'Strategy for Housing' Hearing Statement on behalf of Tresco Estate Partnership January 2020



### ISLES OF SCILLY LOCAL PLAN: PUBLIC EXAMINATION MATTER 2 HEARING STATEMENT ON BEHALF OF TRESCO ESTATE PARTNERSHIP 6<sup>TH</sup> JANUARY 2020

## Introduction

Our client, Tresco Estate Partnership (the submitter), is the largest business on the Isles of Scilly. In addition to commercial properties, hotels and holiday cottages Tresco Estate Partnership is responsible for much of the infrastructure on Tresco and to a lesser extent on Bryher.

On behalf of Tresco Estate Partnership, a suite of representations was submitted at Regulation 19 (Presubmission Draft consultation stage in March 2019. Those representations of particular relevance to the Examination Hearing sessions addressed matters of overall strategy for housing, employment and particularly tourism, and proposed restrictions on housing occupancy and balanced housing stock. The respondent number LP-R19-01 was assigned to those duly made representations, and will no doubt have been provided to you.

Whilst not feeling it necessary to actively participate in the hearing session on Matter 1b ('Overarching Issues') or Matter 2 ('Strategy for Housing'), we submit two separate further Examination statements that complement and reinforce our original representations that relate to Matters 1b and 2. The following represents our further complementary Examination statement on Matter 2 and a further Examination statement that complements those duly made representations that relate to Matter 1b is submitted separately.

## Matter 2 – Strategy for Housing

2.4 Is policy LC1 justified in requiring any market homes, proposed to facilitate the delivery of affordable dwellings, to be occupied as principal residences only, subject to the exceptions detailed in part 4 of the policy?

# Policy LC1

The Council's approach of restricting new open market housing to occupation as principal residences is considered a unreasonable policy as previously explained. All this policy will do is to attract wealthier retirees, further skewing the demographic of the islands as referred to in paragraph 272 of the Submission Local Plan and resulting in social and financial pressures for the island. This cohort will likely contribute less intensively to the tourism and wider economy of the islands than open market housing unfettered by such a restriction. There is no certainty that wealthier retirees will contribute any more to the community and will in turn likely increase demands on public service infrastructure.

We therefore consider that part 4 of Policy LC1 should be amended to remove the 'principal residence' restriction.

2.6 Is there evidence to justify the need for and viability of policy LC3's requirement in respect of Nationally Described Space Standards?

## Policy LC3

2.7 Does Policy LC3 (and its supporting text) adequately explain how the "appropriate mix of dwelling types, sizes and tenures" will be determined?

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It is noted that the Council has amended Policy LC3 'Balanced Housing Stock' to remove the requirement for the Nationally Described Space Standards to be applied as maxima for all new dwellings, and to remove the implied requirement that all new dwellings should be 'affordable'. These changes are welcomed.

# 2.10 Is there sufficient clarity as to what are the "minimum range of internal space standards" referred to in policies LC8 and LC9?

### Policy LC8 & LC9

We consider there remains a lack of justification for an arbitrary restriction on the size of any replacement dwelling or extension to the minimum Nationally Described Space Standards. The Submission Local Plan's supporting text refers in paragraph 290 to the impact of a replacement dwelling being likely to be greater with increases in size. We maintain that an arbitrary approach to the size of replacement dwellings and extensions is unreasonable and each case should be judged on its own merits, mindful of site's physical context, sustainability and the potential benefits of accommodating growing families and greater support for the economy. We therefore maintain that the Local Plan, which should be read as a whole, provides adequate policy framework for proposals for replacement dwellings and extensions to be considered.

An important concern that transcends all the above policies is that any planning restriction makes getting a mortgage difficult. The imposition of unnecessary and unreasonable planning restrictions would thus limit purchasers to those with very large deposits or cash buyers further attracting wealthier retirees and skewing the islands' demographic bell-curve towards the older population.

We trust the above is helpful in emphasising the importance of a flexible policy framework in achieving a balance of homes across the islands that will ultimately help support the economy.