

**Cheltenham Borough, Gloucester City
and Tewkesbury Borough councils'
Strategic and Local Plan (SLP)**

**Residential above
Shops Topic Paper**

August 2025



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1 Introduction and Purpose

- 1.1 This paper has been prompted by the ongoing Urban Capacity Study (UCS) work undertaken by the Strategic and Local Plan (SLP) team. The purpose of the UCS is to assess the urban areas within the SLP boundary's potential to help provide dwellings to meet the SLP needs. As part of this work one of the issues that required further assessment was for the opportunities of residential above shops in the areas city, towns, district and local centres to be considered.
- 1.2 This paper will look at any relevant national policy / guidance and existing and emerging corporate objectives in relation to residential above shops and will briefly highlight responses received to the [SLP Regulation 18](#) undertaken in Autumn / Winter 2023 relating to the issue.
- 1.3 This paper will assess the baseline information available and evaluate the opportunities and challenges that this urban capacity source brings. This understanding will help inform the appropriate policy response that will be incorporated into the emerging SLP as well as helping ensure that measures are embedded into wider plan-making principles.

2 National Policy and Legislation

National Planning Policy Framework (NPPF)

- 2.1 The [National Planning Policy Framework](#) represents the Government's position on planning policy. It is a material consideration in plan making and planning decisions. The most up-to-date iteration of the NPPF was published in December 2024 which sets out the Government's planning policies for England and how these should be applied (para 1).
- 2.2 Para 90 states that: *"Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation"*.
- 2.3 It stresses that planning policies should (interalia):

- a) *“define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (**including housing**) and reflects their distinctive characters;*
- b) *define the extent of town centres and primary shopping areas, and **make clear the range of uses permitted** in such locations, as part of a positive strategy for the future of each centre;*
- d) ***allocate a range of suitable sites in town centres** to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;*
- f) *recognise that **residential development** often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites”.*

Planning Practice Guidance

2.4 The Government's web-based [Planning Practice Guidance](#) which is technical guidance that supports the NPPF advises on [Town centres and retail – GOV.UK](#) and states (Paragraph: 001 Reference ID: 2b-001-20190722) that:

*“A wide range of complementary uses can, if suitably located, help to support the vitality of town centres, including **residential**, employment, office, commercial, leisure/entertainment, healthcare and educational development.”*

2.5 In 2020/2021 the government introduced changes to planning legislation as a means to regenerate and revitalise town centres, attract footfall, and help to solve the housing crisis. The main changes are set out below:

Changes to the Use Class Order

- 2.6 The [Town and Country Planning \(Use Classes\) Order 1987](#) (as amended) essentially categorises different types of property and land into classes. Changes between uses within the same class does not constitute development and therefore does not require planning permission, although in some cases it does require Prior Approval¹.
- 2.7 The [Town and Country Planning \(Use Classes\) \(Amendment\) \(England\) Regulations 2020](#) amended the Use Classes Order (UCO) and introduced significant changes to the system of use classes.
- 2.8 These changes were made in parallel to additions to permitted development rights, with the aim being to support the high street revival and allow greater flexibility to change uses within town centres without the need for express planning permission.
- 2.9 Introduced in September 2020, Class E brought together a number of former uses under one broad 'commercial, business and service' heading and permits changes of use between shops, restaurants, cafés, clinics, crèches, banks, offices, light industrial, indoor sports to another (or multiple and changing uses across the whole day) use within the use class E. It covers many of the activities traditionally found in high streets or town centres and is intended to support flexibility and diversity.
- 2.10 The aim is that in bringing these uses together and allowing movement between them gives businesses greater freedom to adapt to changing circumstances and to respond more quickly to the needs of communities.

Changes to Permitted Development (PD) Rights

- 2.11 The [Town and Country Planning \(General Permitted Development etc.\) \(England\) \(Amendment\) Order 2021](#) identifies some PD rights allowing the change of use from one

¹ [When is permission required? - GOV.UK](#)

class to another, subject to conditions.

- 2.12 New PD rights to allow the change of use in England from any use, or mix of uses, from the Commercial, Business and Service use class (Class E) to residential use (Class C3) was introduced under Class MA of the 2021 Order, coming into effect in August 2021. A key purpose of these changes to PD rights was to streamline the planning process and make it more efficient. This allows unused commercial buildings to be granted permission for residential use via a fast-track prior approval process which can only take into account flooding, noise from commercial premises and adequate light to habitable rooms (also includes the impact of the loss of a health service) and in Conservation Areas the impact of the loss of a ground floor Class E use.
- 2.13 Subsequent to these changes the government also introduced legislation stating that all new dwellings must conform to the national space standards. This means that a single bedroom flat for one person must have an internal floor area of at least 39 square metres if the home has a bathroom, or 37 square metres if the space has a shower room. In addition, all rooms should have adequate natural light. This means that there should be a window in every room and one that doesn't have its access to light blocked by a nearby wall.
- 2.14 These requirements will apply to all Class MA prior approval shop-to-residential conversions.

3 Regulation 18

- 3.3 The SLP will bring together four core elements – formerly the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy (JCS) and the local plans for each of those areas – under a single examination setting out a long-term vision for development.
- 3.4 As part of the preparation for the plan a public consultation under Regulation 18 was undertaken that focused on spatial options and key policy areas.
- 3.5 One of the policy areas considered was Retail and City / Town centres. Two questions were put forward to initiate debate on this topic alongside online workshops facilitated by officers. The

responses have been analysed fully in the Centres Topic paper undertaken as part of the SLP evidence base. In this analysis it was evident that there was a strong consensus that there should be more emphasis on urban renewal with more residential in town centres.

- 3.6 Densification was also often suggested – increasing densities and allowing change of use of upper floors to residential. There were also suggestions to reclaim large scale supermarket (including out of town retail) sites for houses and local retail, given that shopping habits for groceries have changed.
- 3.7 There was also concern about existing empty retail sites as it was considered that these can make centres unwelcoming, discouraging people to visit. A suggestion was to reduce the total number of retail outlets and concentrate them together, repurposing dispensable units to provide housing. There was also concern that if shops are replaced by housing, those areas may no longer feel like part of the centre or the high street.
- 3.8 It was stressed that we need to change the reason why people come into the town centre and instead of looking at footfall, which is very retail based, we should look at need. There was a suggestion that more residential, housing provision for the elderly and a better diversity and mix in centres is needed.
- 3.9 Given the number of comments received on this issue it is clear that it is of local and not just national importance and therefore needs to be fully understood and explored.

4 Context

- 4.3 Redeveloping residential uses above shops brings both opportunities and challenges and these are summarised below.

Opportunities

- 4.4 Building homes above shops could be seen to be one of the least controversial ways of **meeting the government's housing targets** as it reduces the pressure on both greenfield and Green Belt land and utilises existing buildings and brownfield land

- 4.5 The Covid-19 pandemic brought to a head a long trend of transition for high streets, and this is reported within the Centres Topic Paper published as part of the SLP evidence base. The impact of covid leading to reduced footfall and forcing shop closures has led to a significant trend in recent years in the rise of mixed-use spaces on the high street. Retail spaces are increasingly being combined with residential, office, and leisure facilities, creating multifunctional hubs, evolving high streets into 'live-work-play' environments. These mixed-use developments are attracting a steady flow of visitors throughout the day, **boosting footfall** and **economic activity**.
- 4.6 By utilising existing commercial buildings that may be sitting vacant or underutilised, PD rights encourage developers to **repurpose these spaces into homes**.
- 4.7 Utilising existing buildings also contributes to **sustainable development** by making use of existing infrastructure such as roads, utilities, and public transportation.
- 4.8 Restoring existing buildings can also help to **reduce carbon emissions** associated with construction and contribute to an area's character and heritage.
- 4.9 Building above shops in historic areas where the buildings are in decline could help preserve these buildings and their **sensitive heritage**.
- 4.10 Building above shops into spaces that are currently redundant could **regenerate and enhance communities** and **provide affordable homes**.
- 4.11 More residents living in centres provide natural surveillance (or 'eyes on the street'²) which leads to increased perceptions of safety in a place and can **reduce crime rates**.
- 4.12 People living above the shop provide many benefits to the wider economy with increased spend in the centres **bringing revenue to local businesses**.
- 4.13 Residential supports retail and refurbishment of buildings **creates jobs** in the construction industry.

² Jane Jacobs, The Death and Life of Great American Cities

- 4.14 Centres can be attractive places to live for people of all ages. Older people can benefit from being able to access services and local facilities, **reducing the risk of isolation** and promoting health into older age. In turn younger people enjoy the vibrancy of town centre life and **assist the night time economy**. In addition, families with children can enjoy the **access to family-friendly activities** and the convenience of shopping closer to home.

Challenges

- 2.3 In historic centres there can be a problem with **restrictions in the internal configuration of buildings**, meaning the available space is often not flexible enough for conversion to residential. There may also be a **development deficit**, meaning the costs of refurbishment and redevelopment of an empty, historic property outweigh the potential commercial return. This is often related to the existing land use vale discussed in the [PPG - Viability](#).
- 2.4 **Gaining safe access** to the upper floor of a building may be difficult. Whilst in some cases, the front door will be at street level and is separate to the ground floor use, it is not unusual to have to gain access to the upper floor through a restaurant, shop or other commercial use. This can be restricting and is not appealing to potential residents.
- 2.5 **Parking is another challenge** – parking may be shared or there may be no parking in association with the main building which limits the appeal for some would be residents.
- 2.6 Depending on the use of the main building there may be **environmental health risks** in terms of potential contamination / pollution for potential residents and the cost of ensuring the risk is minimalised may be too great to offer a potential return.
- 2.7 Given that the residential use would be on the upper floors of a building there is a risk that in a flood event the occupants would not be able to gain safe access to dry land, leading to **health and safety concerns** that arise from this situation.
- 2.8 Given that there is such a mix of town centre uses there may

- be considerable **noise impacts** from surrounding commercial premises on potential occupants which will need to be considered and mitigated against.
- 2.9 In some circumstances it may be difficult to ensure adequacy of **natural light** to the proposed habitable rooms of the redeveloped building.
- 2.10 It can be the case that mortgage lenders are less inclined to lend to buyers of flats above shops given the perceived adverse impacts making them **more difficult to sell**. In addition, **insurance premiums are higher** for flats above businesses such as restaurants with a higher safety risk factor.
- 2.11 As retail units (particularly older units) are not typically set up with purpose built, high quality, residential living in mind on their upper floors, they are likely to need **significant adaptation and alterations** to make them fit-for-purpose. This is a cost that may not be feasible for a landlord or council in terms of the potential economic return.
- 2.12 It can be costly and difficult to satisfy both planning and building regulations in the refurbishment of upper floors and ensuring the building can satisfy recently introduced **nationally described space standards**.
- 2.13 Difficulties in **identifying vacancy rates** is another challenge as above the shop units could be classified as either residential or commercial and might not be included in vacancy data if, for instance, the ground floor of the building is occupied.
- 2.14 These challenges can be more difficult when trying to secure **affordable housing** opportunities in the form of living above shops. Another issue that makes this particularly difficult is control of the land. Local Planning Authorities (LPA's) generally need control of the land on which the unit is sited to deliver successful affordable housing and retail premises don't offer an easy resolution. Registered providers and LPAs are generally not equipped with the capacity to manage mixed retail and residential development and the challenges that come along with these concerning regulation, **ongoing management, standards and financial stability**.

Considerations

- 2.15 Clearly the opportunity for the provision of living above shops offers positive benefits in a number of ways and they could provide a useful source of urban capacity provision. However, there are many barriers to overcome in order to identify these opportunities which are generally outside the remit of the LPAs. This is largely due to the difficulties in identifying ownership of these units as it is very disparate, and in addition vacancy data does not identify upper floors as it is the ground floor uses that are recognised, given land ownership complexities. Therefore, unless the building is within council ownership it is up to landowners to pursue opportunities.
- 2.16 The government have changed legislation to make the change of use process easier and more streamlined but there is not any clear, straightforward guidance beyond the complicated wording of the legislation to help landowners to understand these opportunities. There needs to be a focus for this type of residential redevelopment and a clear signal to the market that this is a worthwhile option that the LPAs will positively encourage. Addressing this could unlock a range of development sites and produce a domino effect on neighbouring properties.

7 Existing LPA data / studies

Local Information

- 7.1 Each LPA has baseline corporate evidence from various disciplines that can be considered in the context of this Topic Paper. It is important to ensure a joined-up approach is taken to ensure the best policy approach is engaged to meet wider strategic aims. The following section summarises how the issue is viewed from a corporate perspective:

Cheltenham

- 7.2 [Cheltenham Borough Council's Corporate Plan](#) (2023–2027) sets out five key priorities. One of these is *'Increasing the number of affordable homes through the £180m housing*

investment plan'. This is being achieved through a strong pipeline set to deliver significant numbers of additional affordable homes. The council are also investing in energy-efficient homes and enabling development and regeneration opportunities to support more town centre living.

- 7.3 Cheltenham Borough Council and Cheltenham BID have also produced a [Vacant Units Action Plan](#) (2024) that has a series of objectives including to:
- Understand the current and ongoing position of empty units in the town centre;
 - Encourage the conversion of empty and underused space to maximise brownfield residential development;
 - Work with landlords, agents, and town centre businesses to ensure that stakeholders understand key issues facing town centre development;
 - Encourage flexibility of the planning system and future strategic planning to bring more residential accommodation to the town centre;
 - Highlight opportunities for regeneration and recognise the value of key development sites within the town acting as a catalyst for lasting change.

Gloucester

- 7.4 [Gloucester City's Corporate Plan](#) (2025–2028) includes an overarching vision which is *'Putting the heart back into Gloucester'*. This vision is driven by the council's key objectives to *'build more affordable homes'*, *'deliver regeneration'* and *'make the city an exciting and attractive place to live and visit'*.
- 7.5 Additionally they have been partners in the [Cathedral Quarter High Street Heritage Action Zone](#) (HAZ) (2020–2024) run by Gloucester City Council, which is a government-funded initiative to fuel the economic, social, and cultural recovery of high streets. In Gloucester's case they were able to facilitate a number of retail to residential opportunities within Westgate through this programme.

Tewkesbury

- 7.6 [Tewkesbury Borough Council's Council Plan](#) (2024–2030) sets out the vision of '*Supporting People, Strengthening Communities*'. It is underpinned by 3 priorities: '*caring for people*', '*caring for the environment*' and '*caring for place*'.
- 7.7 The council commissioned the [Tewkesbury Town Centre Community Streets Audit](#) in October 2022 which informed the [Tewkesbury high street heritage action zone](#) (2020–2024). The findings are set out in a power point presentation available online that details projects that have been undertaken in the high street to enhance the public realm and educational and cultural projects that are informing and inspiring the public to care for the high street. They include grants to successfully bring 6 upper floor properties back into residential use.
- 7.8 The council are also in the process of preparing a town centre masterplan with emphasis on heritage and connectedness; design guidance for the three main development sites and the importance of the town centre linking positively to the Cotswolds Designer Outlet and garden communities.
- 7.9 Each LPA is keen to encourage residential into their centres and living above shops can be seen to be one of the means to achieve this.
- 7.10 Cheltenham has a good baseline understanding of vacant units in their area with aims for regeneration and working collaboratively to support more town centre living. An example is in their support for a proposal to change under-used storage into residential accommodation on the upper floors of the Cheltenham Radley store on the Promenade.
- 7.11 Gloucester is driven to build more affordable homes and deliver regeneration in its centre and have supported a number of retail to residential permissions through a recent HAZ which focused on Westgate street. In addition, another good example of a major scheme with first floor residential and retained shop frontages on the ground floor in Gloucester is the former Sainsbury's in Northgate Street.

- 7.12 Tewkesbury is focused on place making and design guidance with initiatives already delivering residential to upper floors in the town centre. They also place great focus on housing and homelessness with objectives to support new affordable housing delivery using a community-led approach.

National Studies

- 7.13 [Homes on our high streets](#) (December 2017) is a national study focused on living above shops. This was commissioned by the Federation of Master Builders and produced by Lichfields and Child Graddon Lewis. This study explored the role of space above shops for residential development in the UK making recommendations to local and national government as to how more of this type of development can take place. The main recommendations were as follows:
- 1. LPAs should explicitly make reference to building homes above shops on the high street within their various planning documents such as local plans, SPGs and SPDs.*
 - 2. LPAs should help find ways to overcome disparate ownership and limited building access and/or infrastructure in order to make redevelopment of residential units easier.*
 - 3. Where the market is not yet strong enough to make such development viable, central government should make available low-cost loans, grants and fiscal incentives.*
 - 4. Local authorities, local community groups and developers should work collaboratively with property owners to highlight the potential of this type of development.*
 - 5. All partners involved in building residential units above shops should harness the ability of local community groups to catalyse development.*

Other Useful Studies

- 7.14 In the UK, living over the shop was an initiative originally pioneered in 1989 by Ann Petherick, a freelance planner. There hasn't been much research into the concept in the UK, however York has been a pioneer in seeking to tap into this potential in their city centre. This was prompted by [a report](#) commissioned

by York City Council and undertaken by the North of England Civic Trust (NECT). This study suggests between 1,000 and 1,500 people could be housed in unused space above shops in York city centre, even taking into account the number of buildings that might not be suitable for conversion.

- 7.15 The Irish government has undertaken much more research and targeted vacant above the shop units for years through tax incentives like the Living City Initiative (previously Living over the Shop), planning exemptions, and financial supports to convert vacant units to residential use (e.g. the Repair and Leasing Scheme). These schemes have had variable levels of take up, yet vacancy has remained a persistent feature of many Irish towns and cities. A number of studies and research has been undertaken to understand the challenges including [Opportunities and challenges for vacant above the shop units](#) undertaken by Dublin City University.
- 7.16 Research has reported that the reasons for low take up is due to the renovation / conversion of these units tending to be more expensive, risky, and slower than building on greenfield or brownfield sites. Renovations tend to be substantial and involve a host of building works, from rewiring to reflooring to fireproofing.
- 7.17 Also, as part of their research, a feasibility study was conducted to see if they could acquire and renovate a building with vacant above the shop units to contribute to their affordable housing stock. It found that given that renovating a vacant above the shop unit would cost nearly two or three times more than delivering a new unit, it would be difficult for affordable housing bodies to justify the additional cost, time and uncertainty in utilising this source to provide their much needed affordable homes.

Supermarkets

- 7.18 A number of large food retailers are already recognising the financial and security benefits of providing homes above their commercial premises - Morrisons, Tesco's, Waitrose and Lidl

are among the larger chains that have already delivered through this opportunity, and this is forecast to continue with tens of thousands of these homes expected to be delivered nationwide in the coming years.

8 Existing policy approach

8.1 Before suggesting a future policy approach to the facilitation of living above shops it is important to understand the existing policy foundation set out in the JCS and through the SLP areas individual adopted plans.

8.2 The overarching strategy is set out in policy SD2 of the [Gloucester, Cheltenham and Tewkesbury Joint Core Strategy \(2011-2031\)](#) which was adopted in December 2017. This provides 4 principles that are drawn upon in the determination of planning applications within the area's centres:

- i. New residential, retail, leisure, culture, tourism, office development and community facilities that contribute to the vitality and viability of designated centres will be promoted and supported;*
- ii. Town centre development will be of a scale that is appropriate to its role and function as set out above and will not compromise the health of other centres or sustainable development principles;*
- iii. Proposals that help to deliver the regeneration strategies for Gloucester City Centre, Cheltenham Town Centre and Tewkesbury Town Centre will be supported; and*
- iv. The provision of new local centres of an appropriate scale to provide for the everyday needs of new communities within the identified Strategic Allocations will be permitted.*

8.3 For clarity, within policy SD2, references to 'town centres' and 'town centre uses' apply to city centres, town centres, district centres and local centres and have the same meaning as the definition of 'town centres' and 'town centre uses' included in the NPPF.

- 8.4 The concept of living above shops is not specifically referred to in the policy but there is general support for the encouragement of more town centre living.
- 8.5 Both Cheltenham and Gloucester rely on the JCS strategic policy within their local plans. However, Tewkesbury Borough Council has adopted its own suite of policies (Ret 1 – Ret 3). These focus on its centres with encouragement for more town centre living and regeneration. There is specific mention to living above shops within Policy RET1: ‘Maintaining the vitality and viability of the town, borough and local centres’ which states that: *“The full use of upper floors is strongly encouraged particularly where they are disused or underused”*.

9 Future Policy Response

SLP policy

- 9.1 This paper recognises the significant challenges to the facilitation of living above shops in the SLP centres. One way to try to overcome some of these barriers is for a strong and positive policy to be included within the SLP. This policy approach needs to acknowledge the collective aims set out within adopted corporate and council plans to ensure the issue is also embedded across wider disciplines.
- 10.1 It is recommended that the following should apply in consideration of the future centres / retail policy criterion in the SLP:
- A focus on urban renewal within policy criterion that facilitates repurposing of centres where they are identified as declining, through consideration of measures such as densification.
 - Ensuring that all opportunities for an increase in residential uses within centres are explored, including residential above shops and specific sites / areas allocated within SLP housing policies where the provision of residential would have a positive impact.

- Ensuring that the support for residential above shops applies to not only existing buildings within centres but is also explicitly set out within any new centres created within any new strategic development allocations that require retail as part of a sustainable and accessible scheme.
- Encouraging higher densities in centres, particularly on underused, brownfield, poor quality or vacant land – reflected on an individual LPA basis to acknowledge their differing identities. This would also apply to upper floors within buildings, providing the national space standards are complied with.
- The inclusion of a strong, positive and explicit policy that specifically advocates the efficient residential use of upper floors above commercial premises where appropriate with reference to permitted development rights and the UCO within the reasoned justification.

Wider considerations

10.2 It is considered that there are also wider opportunities outside the scope of the SLP policy to address the facilitation of living above shops through both the LPAs planning policy teams and wider partnership working. It is recommended that the following should be undertaken to ensure that the issue is fully explored and exploited:

- Provide clear guidance to businesses / landowners / developers on the changes to the UCO and PD rights in relation to residential units above shops to increase awareness and understanding of the process that can be undertaken without the requirement for express planning permission. This may help encourage owners of empty upper-floor commercial space to convert their properties into habitable accommodation. Additionally, the creation of a dedicated guidance page on the SLP and individual authorities' websites would also widen the reach.
- The inclusion of thorough monitoring of PD rights through existing authorities housing monitoring to understand

where the Class MA prior approval process is being used to provide residential premises above shops in each area. In addition, through monitoring, the LPAs should analyse planning permissions for such change of uses where full applications are required to understand how supportive each LPA is through the development management process.

- The Investigation of grants and funding available to LPAs and private owners that can be utilised for renovation of above the shop residential units, e.g. the governments [Future High Streets Fund \(FHSF\)](#).
- Exploration and publication of other initiatives, grants, loans and tax relief initiatives supporting architectural heritage and conservation, regeneration and development and energy efficiency/retrofitting that could be relevant to above the shop units in the SLP area.

10 Conclusion

- 10.3 This paper, prompted by the ongoing UCS work, was undertaken to further understand the opportunities and challenges for the SLP in the facilitation of residential above shops in the area's city, towns, district and local centres.
- 10.4 National policy and guidance in the UK around this topic focuses on the regeneration and renewal of centres. Amendments have been put in place by government to both the UCO and PD rights with one of the aims clearly being to address planning barriers to streamline the process of bringing residential to units above commercial premises.
- 10.5 Corporate guidance within the SLP area is currently positive on the issue of more town centre living with a focus on regeneration. Specific LPA policy support is currently provided for residential above shops in the Tewkesbury administrative area.
- 10.6 It is recommended that this approach is extended to include the Cheltenham and Gloucester centres through a specific

positive policy approach in the SLP. In addition to this there is an opportunity to monitor the existing situation in terms of understanding where PD rights are being used to provide residential premises above shops and analysing planning permissions for such change of uses where full applications are required.

- 10.7 It is also recommended that specific guidance is produced to enable landowners to fully understand their PD rights in relation to the provision of residential above shops to encourage this opportunity. It would also be helpful to signpost landowners and housing providers to initiatives, grants, loans and tax relief schemes that are currently available to help with the costly process of renovation.
- 10.8 Through a positive policy approach, explicit guidance, targeted monitoring and partnership working it is anticipated that in the future the issue will be better embedded and those barriers to providing residential above shops will be reduced to subsequently allow more of this source of housing supply to be delivered and subsequently included within the Urban Capacity Studies.