

EXAMINATION OF HARBOROUGH LOCAL PLAN

MATTER 4 – HOMES TO MEET THE NEEDS OF ALL THE COMMUNITY

Inspector's issues and questions in bold type.

This Hearing Statement is made for and on behalf of the HBF which should be read in conjunction with our representations to the pre-submission Local Plan consultation dated 3rd November 2017. This representation answers specific questions as set out in the Inspector's Matters, Issues & Questions document dated 15th August 2018.

4.1 Are the plan's policies sound and effective in delivering a wide variety of quality homes to provide for the needs of all the community? Relevant issues are :

The plans proposals in respect of a mix of sizes and types of home including family homes and homes for older people

The HBF's pre submission consultation response sets out in detail concerns about the introduction of a policy requirement for Nationally Described Space Standards (NDSS) for all dwellings in Policy H5(1b) which are not repeated.

The optional NDSS should only be included in Local Plan policies if they address a clearly evidenced need and where the impact on viability has been fully considered as set out in the NPPG (ID: 56-020).

The Council's evidence in HSG13 Space Standards Justification 2018 is inconclusive in evidencing the need to introduce the NDSS. The Council's evidence is misleading by comparing gross and net floor areas, using 72 sqm standard for 2 bedroom / 4 person house against 2 bedroom / 3 person homes rather than 70 sqm and confusing the NDSS with accessible / adaptable homes standards.

The Council's viability evidence is also misleading by only assessing an averaged NDSS (see Table 5.17) rather than the actual NDSS. So that a 2 bedroom house is assumed to be 72 sqm in the viability assessment rather than 70 sqm for a 2 bedroom / 3 person house or 79 sqm for 2 bedroom / 4 person house (see Table 5.15). If the Council introduces the NDSS as a policy requirement this also involves the introduction of minimum dimensions for bedroom sizes so it is inappropriate to use an average rather than the actual NDSS as a 72

sqm 2 bedroom house may not comply with minimum bedroom sizes (see paragraph 10 in attached Appendix).

There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. As the Council has assessed an average sized house rather than an actual NDSS the full impacts on build costs, selling prices, relevant price points and affordability have not been assessed. It is most likely that the impact has been underestimated.

Harborough has severe affordability pressures (see HBF answer to Matter 1 Q1) so the Council cannot simply expect home buyers to absorb extra costs. An unintended consequence of Policy H5(1b) may be the pushing of additional families into affordable housing need because they can no longer afford to buy a NDSS compliant home.

The Council has also not taken into consideration the adverse effect on delivery rates of sites included in the housing trajectory. The delivery rates on many sites will be predicated on market affordability at relevant price points of units and maximising absorption rates. An adverse impact on the affordability of starter home / first time buyer products may translate into reduced or slower delivery rates.

It is recommended that Policy H5(1b) is deleted.

The delivery of affordable homes

The HBF's pre submission consultation response sets out in detail concerns about Policy H2 which are not repeated.

The Council's Local Plan Viability Report dated August 2017 by Aspinall Verdi does not support 40% affordable housing provision as a minimum as stated in para 5.3.3 of the Local Plan. The Report shows that viability varies across the District dependant on sub-market, site size and / or typology (see Appendices 6 & 7 of the Viability Report) meaning that policy trade-offs between affordable housing and infrastructure provision will be required.

It is recommended that Policy H2 should be reworded to insert the prefix "up to" 40%.

The provision of accessible homes

The HBF's pre submission consultation response sets out in detail concerns about Policy H5(3) which are not repeated.

The Council has provided no evidence specific to Harborough to justify 4% Part M4(2) accessible & adaptable compliant homes on sites of 100+ dwellings. As all new homes are

built to Building Regulation Part M standards an ageing population is insufficient evidence to justify a requirement for the optional standard M2(4).

Policy H5(3) should be deleted.

The provision of specialist accommodation

The HBF's pre submission consultation response sets out in detail concerns about Policy H4(1b) which are not repeated.

Self build and custom homes

The HBF's pre submission consultation response sets out in detail concerns about Policy H5(4) which are not repeated.

It is noted that the Council has provided no updated evidence of number of entries on the Self Build Register. As at 22nd May 2017 there were only 57 entries on Register. The Council has also not provided any further information on the preferences of these entries such as whether entries are looking for individual single plots in town or village locations. The HEDNA 2017 anticipated that most self build homes would be delivered on small windfall sites. The Council has provided no evidence of demand for self build plots on large housing sites of 250+ dwellings. Therefore there must be significant uncertainty about the uptake of any such self build plots if provided.

Local Plan policies should be clearly written and unambiguous so that developers making planning permission applications and development management officers / elected members of Planning Committees determining planning permission applications know what to expect from development proposals. Policy H5(4) is vaguely worded stating that housing developments for 250 or more dwellings should provide land for self build and custom build dwellings to help meet identified local demand. It is unclear who assesses the demand or how? Such confusion potentially causes delays in firstly preparing a planning permission application and secondly development of the site if any consented plots are not built by self builders.

Policy H5(4) should be deleted. If retained the policy should be reworded to encourage rather than require provision of self build plots.

HBF HEARING STATEMENT MATTER 4 APPENDIX

CONTENTS

**EXTRACT FROM DCLG TECHNICAL HOUSING STANDARDS – NATIONALLY
DESCRIBED SPACE STANDARD**



Department for
Communities and
Local Government

Technical housing standards – nationally described space standard

March 2015
Department for Communities and Local Government

Technical housing standards – nationally described space standard

Introduction

1. This standard deals with internal space within new dwellings and is suitable for application across all tenures. It sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height.
2. The requirements of this standard for bedrooms, storage and internal areas are relevant only in determining compliance with this standard in new dwellings and have no other statutory meaning or use.

Using the space standard

3. The standard Gross Internal Areas set out in Table 1 are organised by storey height to take account of the extra circulation space needed for stairs to upper floors, and deal separately with one storey dwellings (typically flats) and two and three storey dwellings (typically houses).
4. Individual dwelling types are expressed with reference to the number of bedrooms (denoted as 'b') and the number of bedspaces (or people) that can be accommodated within these bedrooms (denoted as 'p'). A three bedroom (3b) home with one double bedroom (providing two bed spaces) and two single bedrooms (each providing one bed space) is therefore described as 3b4p.
5. This allows for different combinations of single and double/twin bedrooms to be reflected in the minimum Gross Internal Area. The breakdown of the minimum Gross Internal Area therefore allows not only for the different combinations of bedroom size, but also for varying amounts of additional living, dining, kitchen and storage space; all of which are related to the potential occupancy.
6. Relating internal space to the number of bedspaces is a means of classification for assessment purposes only when designing new homes and seeking planning approval (if a local authority has adopted the space standard in its Local Plan). It does not imply actual occupancy, or define the minimum for any room in a dwelling to be used for a specific purpose other than in complying with this standard.
7. Minimum floor areas and room widths for bedrooms and minimum floor areas for storage are also an integral part of the space standard. They cannot be used in isolation from other parts of the design standard or removed from it.

8. The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls¹ that enclose the dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. The Gross Internal Area should be measured and denoted in square metres (m²).
9. The Gross Internal Areas in this standard will not be adequate for wheelchair housing (Category 3 homes in Part M of the Building Regulations) where additional internal area is required to accommodate increased circulation and functionality to meet the needs of wheelchair households.

Technical requirements

10. The standard requires that:
 - a. the dwelling provides at least the gross internal floor area and built-in storage area set out in Table 1 below
 - b. a dwelling with two or more bedspaces has at least one double (or twin) bedroom
 - c. in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m² and is at least 2.15m wide
 - d. in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m²
 - e. one double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide
 - f. any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1m² within the Gross Internal Area)
 - g. any other area that is used solely for storage and has a headroom of 900-1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all
 - h. a built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72m² in a double bedroom and 0.36m² in a single bedroom counts towards the built-in storage requirement
 - i. the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area

¹ The internal face of a perimeter wall is the finished surface of the wall. For a detached house, the perimeter walls are the external walls that enclose the dwelling, and for other houses or apartments they are the external walls and party walls.

Table 1 - Minimum gross internal floor areas and storage (m²)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	