

Planning Policy
Rossendale Borough Council
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SENT BY EMAIL
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30/11/2020

Dear Sir / Madam,

ROSSENDALE LOCAL PLAN: ADDITIONAL EVIDENCE

1. Thank you for consulting with the Home Builders Federation (HBF) on the Additional Evidence produced as part of the Examination into the Rossendale Local Plan.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

Housing Standards (Action 4.2)

3. Section 4 of the Housing Standards Paper provides the Council's evidence in relation to the optional housing standards for M4(2) and M4(3).
4. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. And it should be remembered that all new homes will be built to part M4(1), according to Part M of the Building Regulations meeting M4(1) will ensure reasonable provision for most people, including wheelchair users, to approach and enter the dwelling and to access habitable rooms and sanitary facilities on the entrance storey. As such these standards are likely to be suitable for the majority of people.
5. However, if the Council wishes to adopt the higher optional standards for accessible & adaptable homes (M4(2) and M4(3)) the Council should only do so by applying the criteria set out in the PPG. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and

adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Rossendale which justifies the inclusion of optional higher standards for accessible / adaptable homes in its Local Plan policy.

6. The Housing Standards Paper reiterates much of what is covered in the SHMA and continues to provide some information in relation to the ageing population and the need for homes for older people. It highlights that there is an increasingly ageing population and that there are higher proportions of people with long term health problems or disabilities within the social rented sector.
7. The Paper continues to provide very limited information in relation to the size, location, type and quality of dwellings needed. Therefore, it is not clear whether the homes provided as part of the requirements of Policy HS8 should be of a particular type or size, or whether they would actually appeal or be appropriate for those that need them. The Paper highlights that the suitability and location of older peoples housing can be an issue for example developments located on steep roads or within flood risk areas, it does not however, suggest how this could be addressed through the policy or whether homes in these areas would still be expected to meet the requirements of the policy.
8. The Paper also continues to provide very little information in relation to the accessibility and adaptability of the existing stock, with the paper highlighting that there is no specific data on the accessibility of housing stock in Rossendale, and that the national data is dated. It is not clear how this information is considered to support the need for the introduction of the M4(2) standard.
9. The HBF notes that that the Paper suggests that requirement for M4(2) will have a relatively limited impact on the viability of development. The HBF however, remains concerned. The Viability Assessment clearly shows that there are viability issues within the area and the cumulative impact of these policies will only make development less viable and homes less likely to be delivered.
10. Section 5 of the Housing Standards Paper sets out the Council's evidence in relation to the nationally described space standards (NDSS). Again, these enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis.
11. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:
 - **Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

- **Viability** – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
 - **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.
12. The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.
 13. The Housing Standards Paper now sees the Council consider three schemes, with a total of 51 dwellings, to provide the necessary evidence to support the need for the NDSS. The HBF does not consider that this is a satisfactory sample size to determine the need for the NDSS to be introduced.
 14. The HBF considers that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market. The HBF has concerns that the introduction of the NDSS could lead to people purchasing homes with a smaller number of bedrooms, but larger in size due to the NDSS, which could therefore have the potential to increase issues with overcrowding and potentially lead to a reduction in quality of the living environment.
 15. The HBF is also concerned that the requirements of this policy may reduce choice and affordability and could in turn impact on delivery of homes. There is no evidence that the properties have not sold, or that those living within these properties consider that they do not meet their needs. There is no evidence provided that the size of the homes being completed are considered inappropriate by those purchasing them or that these homes are struggling to be sold in comparison to homes that do meet the standards.
 16. The HBF in partnership with NHBC undertake a Customer Satisfaction Survey¹ annually to determine the star rating to be given to individual home builders. This is an independently verified survey and regularly demonstrates that new home buyers would buy a new build home again and would recommend their homes builder to a friend. The results of the 2018/19, the most up to date information available, asked how satisfied or dissatisfied the buyer was with the internal design and layout of their new home, 93% of those who responded were either

¹ <https://www.hbf.co.uk/policy/policy-and-wider-work-program/customer-satisfaction-survey/latest-results/>

fairly satisfied (28%) or very satisfied (65%). This does not appear to suggest there are significant number of new home buyers looking for different layouts or home sizes to that currently being provided.

17. As set out in relation to the M4(2) requirement, the HBF has concerns in relation to the viability of development in the area and are concerned that this requirement will also add to the viability issues.
18. The Paper suggests that as the Council have been consulting on this as part of the emergence of the plan that a transition period is not necessary, the HBF does not agree that this is appropriate. Until the Plan is adopted there is no certainty that the policy will be taken forward, as such the HBF still considers that a transition period should be included.

Future Engagement

19. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
20. The HBF would like to participate at any further examination of this local plan, to ensure we are able to debate the comments made within our representation in greater detail as required and to ensure we are able to respond to any additional evidence provided by the Council or others following submission of the plan.

Yours sincerely,



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