

Sent by email to: planning.consultation@gravesham.gov.uk

30/12/2020

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the Gravesham Local Plan

Thank you for consulting the Home Builders Federation (HBF) on the Gravesham Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Meeting the Borough's housing needs

Question 5: Should the Local Plan Partial Review's housing requirement follow the Government's standard method formula, including taking into account unmet needs from neighbouring authorities?

The Council should base the minimum number of homes it should plan for on the standard method. As the Council will be aware the latest iteration of this methodology has now been confirmed in PPG and retains the use of the 2014-based household projections as the baseline on which housing needs should be assessed. However, it must be remembered that this is the minimum number of homes they are required to deliver. As the Council recognise unmet housing needs must also be considered as part of this process but we would highlight that paragraph 60 of the NPPF highlights that local planning authorities should consider neighbouring areas not just neighbouring authorities. This is a much wider consideration to take into account unmet needs on a regional and sub regional basis. Given this clear requirement of national policy to look beyond neighbouring authorities it will be important for the Council to recognise the scale of unmet needs in London.

It is evident from the final report on the examination of the London Plan that the capital will not be able to meet its own housing needs. It was expected that the new London Plan would address future needs and the back log of unmet needs by delivering over 60,000 homes per annum. However, the examination report on new London Plan, which was published in October 2019, outlines in paragraph 174 that the overestimation of the contribution of small sites reduces the supply of new homes from



65,000 to 52,000 homes per annum. This means that there is a shortfall of some 140,000 homes between 2018 and 2028 in the capital against its own assessment that the capital needs to deliver 66,000 homes each year across the plan period to meet future need and address the current backlog. Without a significant increase in delivery, it is almost inevitable that the identified shortfalls will drive increased levels of out-migration from the capital to surrounding areas adding pressure in housing markets where affordability is already poor.

One such area is Gravesham which, as indicated in the Council's own analysis has had significant levels of positive net migration from the capital in recent years. Paragraph 2.9 of the report on Housing and Demographics shows that nine of the top ten authorities with net inflows into Gravesham are London Boroughs. Net migration to Gravesham from London has been estimated by ONS to averaged 1,068 people per annum since 2012¹. The increase in migration has also increased rising from 871 to 2012 to 1,465 in 2019.

As such a lack of supply in the capital will place greater pressure on the housing market in Gravesham, and similar areas that form part of the wider regional housing market focussed on the capital, as households seek to meet their accommodation needs outside of London. It is therefore essential that any consideration as to current housing situation facing Gravesham takes account of the shortfalls in supply in London given the Borough's strong migratory links with the capital.

Question 7: The current Housing Market Area boundary (Figure 7) is based on recorded trends. Do you have any evidence to suggest that the Borough's Housing Market Area may have changed since the Strategic Housing and Economic Needs Assessment was undertaken? If you do, or if you disagree with the boundary set out in Figure 7 please state why and provide evidence to support an alternative boundary.

We would not disagree with the Council's assessment of its localised housing market area, but it will be important for the Council to acknowledge that it is part of a much wider housing market area focused on London. The majority of the trends seen in smaller housing markets across the Wider South East result from the influence of the capital and as such a failure of those authorities around London to address the unmet needs arising in the capital will result in those trends continuing. As we set out above the Council is strongly influenced by migration from the capital and clearly forms part for a wider London Housing Market Area and should increase its housing requirement beyond the minimum it is required to plan for using the standard method.

Question 8: Should the Borough Council require developers to specifically meet the needs of specific groups such as the elderly? If the answer is yes, how would this be achieved?

¹ Internal migration: detailed estimates by origin and destination local authorities (ONS)
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/migrationwithintheuk/datasets>

No. The Council should take a more proactive role in meeting the needs of older people by identifying suitable sites for development such as retirement homes to meet the needs for specific group and allocate these in the local plan. The Council must work with the providers of such development to ensure that the right sites are allocated in the right places.

Question 9: Would you like to see more first homes and homes for older people built across the whole of the Borough?

With regard to first homes the Council should ensure that it meets the policy requirements of national policy. As set out above the Council must work with the providers of specialist accommodation for older people to identify sufficient sites in the right location to meet their needs.

Question 10: Should the Borough Council be prescriptive in terms of the mix, size and type of housing that should be delivered in the Borough, or should Borough Council continue to provide flexibility to Developers so that they can respond to changing market demands and economic realities? If the answer is yes, how would this be achieved: a single mix, size and type requirement for all sites or a range of requirements for different categories of site?

The HBF understands the need to ensure a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is effective and ensures that housing delivery will not be compromised or stalled due to policies that are prescriptive in applying evidence for a Borough wide mix of housing on every site.

It is important to remember that whilst Strategic Housing Market Assessments (SHMA) can provide a broad snapshot in time of what is needed across an LPA or HMA they do not provide a definitive picture as to the demand for different types of homes in specific locations. So, whilst we recognise the need to achieve a broad mix across the plan period this should not be translated directly into policy. It should be left for developers to supply the homes they consider are necessary to meet demand. The development industry understands what types of homes are needed to meet the demands of its customers, if it did not then the homes would not sell.

We would therefore suggest that any policy on housing mix requires applications for housing development to have regard to the evidence on housing mix but that the final mix is left to agreement between the applicant and developer on a site-by-site basis. This would establish, as required by paragraph 11 of the NPPF, a flexible approach to housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

Question 11: Should the existing approach to density standards in the Borough be changed? If it should, what alternative approaches should be considered?

The Council should, as required by the NPPF seek to achieve appropriate densities that take into account a range of factors. Most importantly the Council should ensure that the policy is flexible to allow lower density developments where appropriate but also recognise that in some locations, such as around transport hubs, increasing the overall density of an area may be appropriate.

Question 12: Should higher density development be sought in close proximity to rural train stations (i.e., Higham, Meopham and Sole Street)?

Yes. The provision of higher density development near transport hubs, whether urban or rural, is an important aspect of delivering sustainable development and is support in paragraph 123 of the NPPF.

Question 13: Should the Borough Council continue to seek up to 30% of new homes as affordable housing in the urban area and up to 35% of new homes as affordable housing in the rural area? What evidence do you have to support your view?

The Council's policy on affordable housing must be based on the need for such homes and the ability of development to provide such homes whilst remaining viable. The Council have not published any updates to this evidence and as such it is not possible to comment on whether the current policy should be amended. In particular it will be important to revisit the viability study to take on board changes in national policy with regard to whole plan viability and the increasing number of additional costs being placed on development.

The 2019 National Planning Policy Framework (NPPF) requires development viability to be resolved through the local plan and not at the planning application stage. The aim of this approach is to ensure that, as outlined in paragraph 57 of the NPPF, decision makers can assume that development which is in conformity with the local plan is viable and to, ultimately, reduce the amount of site-by-site negotiation that takes place. As such it will be important that the Council's approach to its viability assessment and the costs it places on development are cautious to take account of the variability in delivering the range of sites that will come forward through the local plan. To support local planning authorities in preparing their viability evidence the HBF has prepared a briefing note, attached to this response, which sets out some common concerns with viability testing of local plans under the latest guidance and how these should be addressed. Whilst this note focuses on all aspects of the viability testing of the residential development and should be taken into account, we would like to highlight four particular issues with whole plan viability assessments.

The first issue is with regard to the approach taken to abnormal infrastructure costs. These are the costs above base construction and external costs that are required to ensure the site is deliverable. Prior to the 2019 NPPF viability assessments have taken the approach that these cannot be quantified and were addressed through the site-by-site negotiation. However, this option is now significantly restricted by paragraph 57 of the 2019 NPPF. As such these abnormal costs must be factored into whole plan viability assessments. We recognise that the very nature of an abnormal costs is

difficult to quantify, but it is a fact that they are often substantial and can have a significant impact on viability. Where and how these costs arise is also variable. They can occur in site preparation but can also arise with regard to the increasing costs of delivering infrastructure, such as upgrades to increase the capacity of utilities. It is also the case that abnormal costs are higher on brownfield sites where there can be a higher degree of uncertainty as to the nature of the site and the work required to make it developable.

The HBF undertook some work with its members in the North East and whilst this is a different context to that found in Gravesham it provides an indication as to the abnormal costs that can occur. This study, which was prepared to support our comments on the Durham Local Plan, indicated that abnormal costs on the four PDL sites was £711,000 per net developable hectare and an average of £459,000 per hectare on the 10 greenfield sites. Whilst we recognise that abnormal costs are expected to come off the land value, we are concerned that if abnormal costs are high then it will result in sites not being developed as the land value will be insufficient to incentivise the landowner to sell. It is therefore important that a significant buffer is included within the viability assessment to take account of these costs if the Council are to state with certainty that those sites allocated in the plan will come forward without negotiation.

Secondly, we would encourage the Council to use the upper end of any of the ranges suggested with regards to fees and profit margins. Again, these will vary from developer to developer but given that the Government want to minimise negotiation on planning obligations it would make sense to use the highest point of any range. The changing landscape with regard to viability assessment could lead to development slowing significantly if the correct variables are not taken into account.

Thirdly, the council must ensure that all the policy costs associated with the local plan are included within the viability assessment. Whilst affordable housing and infrastructure contributions for the majority of the additional costs that are placed on developers by the Council it is important that the cumulative impact of all policies are tested. With regard to the local plan review the Council will need to consider the impact of its proposed policies on self-build, open space, bio-diversity net gains, electric vehicle charging, sustainable design and construction; and renewable energy.

Finally, the approach to land values needs to be a balanced approach and one that recognises that there will be a point at which land will just not come forward if values are too low to take account of policy and infrastructure costs. There are a variety of reasons why a landowner is looking to sell their land and it cannot be assumed that they will absorb significant reductions in land values to meet policy costs. Land is a long-term investment and the returns being offered must take account of this.

Question 14: Should the Core Strategy thresholds for the provision of affordable housing be changed? What evidence do you have to support your view?

At present the Council's policy has a 15-unit threshold in urban areas compared to the 10-unit threshold set out in national policy. A 15-unit threshold is not unsound, and

should the Council wish to amend its position it should do so on the basis that such a change would not make some schemes of between 10 and 15 units unviable. The Council's policy with regard to rural areas is not consistent with paragraph 63 of the NPPF where the threshold for delivering affordable housing is 5 units. The Council will need to amend this aspect of the policy to reflect the NPPF.

Question 15: Should the Borough Council apply the existing affordable housing requirements to Build to Rent schemes?

The requirement to provide affordable housing must be based on evidence of both need and viability. Without the necessary evidence it is not possible to comment on whether such an approach is necessary or viable.

Question 16: Given the affordability issues in the Borough should a greater mix of sites be identified to boost supply and affordability, with land allocated to also deliver a proportion of the Borough's housing needs on smaller sites?

Yes. The Council's should look to identify sites that will ensure consistent delivery across the plan period by avoiding an over concentration of development in a specific area or an over reliance on large strategic sites. By ensuring delivery on a wide variety of sites the Council will improve the strength of the housing market by encouraging a range of housebuilders to operate in the Borough who in turn will provide a variety of different prices, housing types and styles.

In a similar vein it is essential that the Council is consistent with paragraph 68 of the NPPF and ensure 10% of all homes are delivered on sites of less than 1 hectare. HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure with a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or else the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have. This is why the Government, through the NPPF, now requires local authorities to allocate more sites of varying sizes.

Where and how should the Borough's development needs be met

Question 25: Is the Borough Council's revised settlement hierarchy approach suitable? Please provide details.

We have no comments to make on the revised approach and its outcomes. However, we would caution the Council against sticking rigidly to this hierarchy when seeking to identify sites for new development. The delivery of new development can secure existing services within a community ensuring that settlement remains sustainable not just for new resident but also those already living there. New development can also

bring new infrastructure and services allowing settlements to move up the hierarchy and improve their sustainability. Settlement hierarchies and the assessments supporting them provide valuable evidence as to what is there, but they should not be used to restrict development but understand where new development could provide benefits for both existing and future residents.

Question 26: Are we right not to consider how the changes in technology impact of the sustainability of rural settlements? Or should we update how we assess settlement sustainability?

The Council should consider the changes in technology that will have a significant impact on the way we all work, shop and socialise when considering the impact of a potential allocations in a rural settlement. The changes in the way many people work, and shop mean that some more rural settlements could accommodate more development than would be expected in the past. This should be reflected in the assessment supporting the settlement hierarchy of the assessments of sites submitted for allocation. However, the Council should also recognise that people will still need to have physical access to many services and as such a balanced view as to the impact of new technologies will need to be taken.

Question 28: Which redistribution approach do you consider to be the most effective (A, B, C or D)? Are there any alternative approaches that should be considered?

Firstly, we would not support option A. Option A simply allocates development on a proportional basis and as such takes no account of the actual opportunities for development, the suitability of existing areas to accommodate development or where development would have least impact with regard to any constraints that are present within Gravesham. As such to distribute development in such a manner is less likely to be consistent with national policy, however, without a clear understanding of the sites that would be allocated under this approach it is difficult to comment on its effectiveness.

Elements of option C are not unreasonable and recognises that there may be opportunities to improve the sustainability of settlements due to changing technology, lifestyles, and through new development that brings services and secures existing services. However, in order to meet needs such an approach would require significant improvements in technology and infrastructure in less sustainable settlements and as such could only be relied on to deliver development towards the end of the plan period. It is not a strategy that can be relied on to deliver homes in the short and medium term in a sustainable and sustained manner.

Option B offers an approach considers those areas where there is already development and looks to increase delivery in those locations. There are clearly benefits to this approach in that it has the potential to deliver growth in areas where infrastructure is already being improved and where environmental constraints have been tested. From the analysis in the Sustainability Appraisal there would also seem to be social and economic benefits from such an approach.

To conclude there are benefits in each of the options that may need to be examined alongside the others. It would seem that option B probably is a reasonable “principal” option on which to base plan preparation but that elements from the other options may need to be considered should appropriate sites come forward through this consultation process. Largely, the decision as to where to build will depend on many factors ranging from the availability of developable sites through to the location of infrastructure both now and in the future. The HBF cannot comment on or promote specific locations for development but in our experience if Gravesham is to ensure its development needs are met consistently across the plan period it must allocate a wide variety of sites both in terms of size and location.

Green Belt

Question 30: Do you agree with these criteria? Are there any changes or additional criteria that you consider we should take into account?

Disagree with criteria d. The Green Belt boundary should always follow the curtilage of the property to avoid difficulties with regard to building line which are more difficult to define. If the Council are concerned with regard to inappropriate back land development this should be managed through policy not through settlement boundaries.

Question 31: Should the Council continue with the Local Plan Core Strategy's existing approach of ensuring existing settlements do not merge? If not, why?

Firstly, it is important to note that the NPPF refers to the merger of towns as being one of the five purposes of Green Belt not the merger of settlements. As such the merger of a town and village for example should not form part of the consideration of the Council's assessment of the Green Belt purposes. With regard to the merger of towns the Council will first need to consider whether there are the necessary exceptional circumstances to amend Green Belt boundaries to meet housing needs. If there are exceptional circumstances to amend Green Belt boundaries, then the Council will need to consider how it can minimise the impact of any boundary changes on the objectives of Green Belt whilst also meeting development needs. As part of this consideration the Council will also need to consider whether the boundary amendments being proposed promote sustainable development. As such there may be circumstances where merger of towns is the most sustainable option whilst also minimising harm to the other objectives of the Green Belt. The Council must ensure that the boundary amendments it makes are based on evidence and that its decisions are clearly explained and justified.

Question 32: Do you have any views in relation to the sites identified in meeting the Borough's needs so far?

The HBF cannot comment on the sites identified so far. However, we would reiterate our comments above that the Council should ensure that a wide variety of sites are allocated in order to ensure a consistent level of supply across the plan period.

Question 41: Should the Council require new development to accord with an energy hierarchy, which in order of importance seeks to minimise energy demand, maximise energy efficiency, utilise renewable energy, utilise low carbon energy, and only then use other energy sources.

Housebuilders should be allowed to meet any requirements for improved energy efficiency in a manner that best suits the requirements of the site being developed.

Question 42: Should strategic development allocations be required to make use of decentralised heating and cooling networks?

The Government is committed to achieving net-zero greenhouse gas emissions by 2050. At present the heating of buildings is responsible for a third of the UK's greenhouse gas emissions. To meet the Government's legal commitment virtually all heating within buildings will need to be achieved from carbon neutral sources. Heat networks are one aspect of the path towards this goal, however the predominant technology currently used for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies

The Council should also consider the Department for Business, Energy and Industrial Strategy consultation on Heat Networks: Building A Market Framework which closed on the on 1st June 2020. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity, or water. Some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. These concerns should be considered by the Council

Question 43: Should the Council require new developments to include a detailed carbon assessment to demonstrate how the design and layout of the development has sought to maximise reductions in carbon emissions, where appropriate?

Given that Government are likely to introduce new mandatory building regulations with regard to energy efficiency we would suggest that such assessments will be unnecessary.

Question 44: Should the Council require developers to contribute towards increasing the area of habitats that sequester and store carbon, including through the provision of additional tree and shrub cover within the Borough?

No. Developers already provide significant areas of open space to improve biodiversity and provide open space for residents. This will most likely encompass the planting of new trees and shrubs and as such there is no need for additional policy with regard to the sequestering and storage of carbon.

Question 45: Should the Council seek to deliver net zero carbon development at a faster rate than allowed for by Government Building Regulations?

No. The housebuilding industry, through the HBF, recognises that there is a need to move towards stronger measures to improve the environmental performance of new residential development. This is in terms of reducing carbon emissions in new homes, providing gains in biodiversity on all developments, green infrastructure and improving the environment around new developments.

However, the HBF, and our members, consider a national and standardised approach to improving such issues as the energy efficiency of buildings, the provision of renewable energy and the delivery of electric vehicle charging points to be the most effective approach that balances improvements with continued deliver of housing and infrastructure. It is the industry's preference for a national approach to improving the environmental performance of residential developments, rather than local authorities setting their own standards. We consider this is necessary to allow research and development and supply chains to focus upon responding to agreed national targets, and for training providers to plan their programmes to equip the labour force to meet these new requirements. It is fundamentally inefficient to create a plurality of standards.

The industry will clearly need to take into account the Government's measures on the Future Homes Standard which will be mandatory for new residential developments in 2020. In terms of these new regulatory targets applying to new development from 2025 onwards – to deliver the objectives of the Future Homes Standard – the industry, with the leadership of the HBF, will be commissioning work to consider what the industry can do, taking into account developments in research and product development within that timeframe, and what new standards can feasibly be adopted and implemented by the industry.

Therefore, when considering their approach to such matters the councils should ensure that they are working within the current policy and legislative framework and not seeking to deliver a different range of standards that will work against the collective drive on this matter. The importance of a collective approach will also balance the cost of delivering the energy efficiency improvements required alongside other planning

obligations and development aspirations that the Councils are seeking to deliver through the Gravesham Plan, such as meeting housing needs in full and improving the affordability of homes in this area. The Councils will therefore need to consider the consequences of introducing planning policy burdens on new development recognising that the costs of these will ultimately be passed onto the consumer or leave some sites undeliverable.

Development Management Policies

INF5: Electric Vehicle Charging Points

We would agree with the Council's position stated in footnote 18 that it should await the outcome of the Government's consultation on electric vehicle charging points before progressing with this policy. The HBF supports the use of electric and hybrid vehicles and the introduction of the necessary supporting infrastructure via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. It is the industry's preference for a national approach to the provision of charging points rather than local authorities setting their own standards. We consider this is necessary to allow research and development and supply chains to focus upon responding to agreed national targets, and for training providers to plan their programmes to equip the labour force to meet these new requirements. It is fundamentally inefficient to create a plurality of standards.

The Government has recognised in recent consultations the possible impact of any requirement to provide electric vehicle charging points on housing supply, where the requirements are not technically feasible. The same consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of Electric Vehicle Charging Points (EVCP) in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment.

Where such costs are high the Government are proposing that any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In instances where the additional costs are likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied.

As such we would suggest that the requirement for EVCPs should not be included in the local plan because the Government's proposed changes to Building Regulations

will provide a more effective framework for the delivery of charging points for electric vehicles.

RES1: Self/Custom Build Housing

Whilst the HBF support the encouragement of self-build housing through the local plan, we do not consider the requirement for all major development to set aside 5% dwellings to be delivered through serviced plots for self and custom house building to be justified or consistent with national policy.

The proposed policy must be based on robust evidence of both the demand for self-build plots and a consideration as to the impact on viability of this policy. This evidence is not presented in the consultation document or the supporting evidence. With regard to the evidence on needs the Council state that there is a register but fails to say how many people are on that list nor how many homes it thinks it will deliver from this policy. We have significant concerns regarding the robustness of self-build registers as an evidence base indicating demand for self-build plots. It is important, as required by paragraph 57-011 of PPG, that data on the self-build register is considered against other relevant data sources. This is vital as the data on self-build registers is often flawed in that it does not consider whether individuals on such registers are on other registers in neighbouring areas and whether those on the list are still seeking a self-build plot. If the register has not been reviewed in this manner, we would suggest this is undertaken prior to the next consultation on the local plan. the Council has undertaken a review of its list with regard to such matters.

Secondly, it is important to recognise that paragraphs 57-024 and 57-025 of the PPG sets out a variety of approaches that need to be considered – including the use of the Council's own land. This is reiterated in para 57-14 of the PPG which sets out the need for Council's to consider how they can support the delivery of self-build plots through their housing strategy, land disposal and regeneration functions. We would suggest that in the first instance rather than place additional burdens on house builders for the provision of self-build plots it should utilise its own land or seek to engage with landowners to identify suitable sites on which to deliver serviced self-build plots.

RES2: Residential Space Standards

Space standards

Whilst the HBF shares the Council's desire to see good quality homes delivered across Gravesham we also consider that space standards can, in some instances, have a negative impact upon 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 which would allow people on lower incomes to afford a property which has their required number of bedrooms. Given the poor affordability of property in the area and the tight constraints on development it is therefore important that the Council can provide robust

evidence that there is a need to introduce the optional space standards – that these standards are a must have rather than a nice to have policy.

As the Council are aware paragraph 56-020 of PPG establishes the type of evidence required to introduce space standard through the local plan. The Council must have a robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out in PPG. The evidence presented by the Council does not point to there being a significant problem with regard to the size of new homes being delivered in the area. The Council's key reason would appear to be a concern that the constraints on land supply will inevitably lead to smaller properties. This will only be the case if the Council seeks to require overly high densities on sites rather than release sufficient sites across the Borough to meet needs at reasonable densities.

If the Council can provide the necessary evidence to support the introduction of space standards, we would suggest that the Council provides some flexibility within policy to allow well designed homes that are smaller than the space standards to be provided to meet a specific and identified needs for such homes. This will ensure that those sites that are not deliverable whilst also meeting space standards in full can still be developed.

Accessibility standards

We note that the Council is still to produce evidence to support its proposed policy that all new homes will need to be built to part M4(2) of the Building Regulations. Whilst we recognise that the Government are currently considering its position with regard to part m of the building regulations the current approach is needs-based and as such the number of homes built to part M4(2) should be proportional to identified needs. With regard to the provision of more accessible homes the HBF recognises that there is a need for some homes to be built to higher accessibility standards it is not necessarily the case that all new homes will need to be built to this standard. The Council will clearly need to consider the numbers of people that will actually require a new adaptable home in future.

We would agree with the range of evidence that the Council have indicated they will look to use in establishing the need for more accessible homes, but we would also suggest the Council consider national evidence provided in the English Homes Survey. Whilst we recognise that this is a national study it provides an indication as to the proportion of more adaptable homes that are required. The study examined the need for adaptations in 2014/15 and noted that just 9% of all households in England had one or more people with a long-term limiting illness or disability that required adaptations to their home and that this had not changed since 2011-12. So, despite an increasing proportion of older people in the general populace the proportion of the population requiring adaptations had not changed. The survey also found that in 2014-15, 81% of households that required adaptations in their home, due to their long-term

²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/539541/Adaptations_and_Accessibility_Report.pdf

limiting disability, felt their current home was suitable for their needs and that 10% of those households whose home required an adaptation were trying to move somewhere more suitable.

Conclusion

We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

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