

Home Builders Federation

Matter 2

MOLE VALLEY LOCAL PLAN EXAMINATION

Matter 2 – Meeting Housing Needs (continued)

Whether the Local Plan has been positively prepared and whether it is justified effective and consistent with national policy in relation to its approach to meeting the community's housing needs?

Policy H6 Housing for Older Persons and Specialist Housing

1. Given the identified need for housing for older persons and specialist housing, would the Plan and in particular policy H6, in the absence of specific allocations, be effective in meeting the community's needs? How would need and supply be effectively assessed and monitored?

The Council's evidence paper on this issue (I8) indicates that there is an acute need for homes with extra care to meet the needs of older people. Paragraph 3.2 states that there is a need for 310 extra care units by 2025. As such the primary focus of the Council should be on allocating appropriate sites to meet the needs of older people. Only through such allocations can the council be certain of meeting the needs of this specific group. However, if such sites are not allocated it is important that, in line with paragraph 62 of the NPPF, that the needs of older people are assessed and reflected in planning policies. As set out in our representations the HBF consider it essential that in order for the local plan to be effective in meeting these needs the Council must set out in H6 how many homes for older people it is required to deliver in order to meet needs alongside a commitment to not only monitor delivery but also adopt a presumption in favour of such development if there is insufficient supply coming forward to meet identified needs.

Policy H9 Housing Mix

1. Would the size mix for market and affordable housing set out in policy H9 be justified by the evidence? Would H9 4 enable appropriate flexibility to reflect site characteristics, location and viability? Would H9 5 be clear and unambiguous in its requirements in relation to larger dwellings?



The SHMA is a snap shot in time across the whole of the Borough. As such it is necessary for there to be flexibility within local plan policies on housing mix to ensure that housing mix reflects the type of site being brought forward, its location and the local market for homes at that location. Whilst the policy provides some flexibility part 4a indicates that this flexibility will be restricted to either high density sites in built up areas and larger housing in areas of extremely low density. These limitations will restrict decision makers from taking forward a more flexible approach with the expectation seemingly that sites that do not meet the tests in part 4 will come forward on the basis of the mix in part 2 of the policy. We would therefore suggest that the policy states that developer should have regard to the stated housing mix having regard to the location of the site, the character of the surrounding area and the type of demand for homes in that area.

Policy H10 Standards, Accessibility, Water and Space

1. Are the requirements in policy H10, in relation to the nationally described space standards and optional accessibility and water usage standards justified by the evidence? Would it be effective in meeting demand for well-designed smaller homes? Would the requirements in H10 1, in relation to optional standard M4(3) 'wheelchair user dwellings' be consistent with national policy and guidance?

The Council's evidence on Nationally Described Space Standards is based on a small sample of sites. These sites were either conversions, change of use or have come forward as permitted development. This provides a relatively small sample of sites in the area and we would question whether it is sufficient to support the adoption of space standards in an area where the Council acknowledge the vast majority of homes come forward above space standards. Whilst the HBF recognises and the support the delivery of high-quality homes we also recognise that there may be times where such homes can be delivered below space standards. Such homes are often more affordable and meet the needs of those struggling to afford homes in areas such as Mole Valley where rents and house prices are high.

With regard to the requirement relating to wheelchair accessible housing the Council will need to make the distinction between a wheelchair adaptable home and wheelchair accessible home under part M4(3) as PPG states at paragraph 56-010 that wheelchair accessible home can only be required through the local plan where "*the local authority is responsible for allocating or nominating a person to live in that dwelling*". The Council must therefore make the distinction between wheelchair accessible and wheelchair adaptable homes.

Mark Behrendt MRTPI
Planning Manager – Local Plans SE and E