

DAVENTRY DISTRICT SETTLEMENTS AND COUNTRYSIDE LOCAL PLAN EXAMINATION

MATTER 3: DELIVERING THE HOUSING REQUIREMENT OVER THE PLAN PERIOD

STATEMENT ON BEHALF OF DAVIDSONS DEVELOPMENTS, BARRATT DEVELOPMENTS AND L & Q ESTATES

Prepared by: Gary Lees

Pegasus Group

4 The Courtyard | Church Street | Lockington | Derbyshire | DE74 2SL

T 01509 670806 | **F** 01509 672247 | **W** www.pegasuspg.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

MATTER 3: Delivering the Housing Requirement over the Plan Period

Issue 1

Whether the Plan is consistent with the West Northamptonshire Joint Core Strategy Local Plan (Part 1) (JCS) and whether it has been positively prepared, is justified, effective and consistent with national policy in relation to the scale and distribution of development proposed.

Question 1

1. *Is there a specific reason or justification why the housing trajectory in the Plan and the Housing Land Availability Report 2018 (HOU7) when setting out the completions and housing land supply position as at 1 April 2018, exclude the NRDA component listed in the JCS? Does the Plan intend to support the delivery of the housing requirement in the NRDA in Daventry as set out in the JCS?*
 - 1.1 As noted in our response to Matter 2 Issue 1 Question 1, to be found sound it is necessary for this Part 2 Plan to demonstrate how it is meeting the DDC housing requirement figure of about 12,730 dwellings as specified in the JCS Policy S3.
 - 1.2 The Housing Trajectory at Appendix J purports a 1,559 dwelling surplus for the plan period compared to the JCS trajectory – but this excludes the NRDA. The submitted draft Part 2 Plan does not provide a trajectory of expected delivery from the NRDA part of DDC and thus it is not clear if the Part 2 Plan is meeting the JCS policy S3 requirement of 12,730 dwellings. What is known from the background papers is that anticipated delivery from the Sustainable Urban Extensions (SUEs) in the NRDA part of DDC is significantly below what the JCS predicted.
 - 1.3 Whilst the submitted draft Plan purports to support delivery of the housing requirement in the NRDA, our response to Matter 2 Issue 1 Question 5 identifies that it presently does not. That paper also identifies how the Plan could be modified to ensure the Plan does indeed support housing delivery across the DDC plan area.

Question 11

11. *Is Policy HO8 justified and consistent with national policy, with respect to the specific requirements relating to market housing, affordable housing, housing standards and specialist accommodation?*

Market and Affordable housing

- 11.1 Paragraph 7 of the Framework states that in performing a social role, the planning system is required to provide a supply of housing required to meet the needs of the present *and* future generations. Furthermore, paragraph 50 states in order to deliver a wide choice of homes, local planning authorities should plan for a mix of housing based on current and future demographic trends. It also states that LPAs should identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.
- 11.2 By identifying an exact percentage for the proportion of houses with specific bedroom amounts, draft Policy HO8 set out a very prescriptive approach to the required housing mix across the District. No consideration has been given to local demand as required by paragraph 50 of the Framework. Only allowing exceptions to this mix where proposals are supported by a robust assessment of needs at a local level is unduly onerous and contrary to the Framework.
- 11.3 The evidence base on which the housing mix and type is prescribed under Policy HO8 is the West Northamptonshire Joint Planning Unit Housing Market Evidence of 2017. Figure 32 on page 60 of this report sets out a purported housing mix for both market and affordable housing. This appear to be based on the housing mix needed by households of each household type and age and apparently uses the ORS Housing Model. No details are provided as to how the model has established this very prescriptive mix.
- 11.4 As noted above, Paragraph 50 of the Framework states that local planning authorities should identify the size, type, tenure and range of housing that is required in particular locations, **reflecting local demand**. It is clear that the evidence base underpinning Policy HO8 is only based on need – and newly arising need. No consideration has been given to local housing demand whatsoever.

- 11.5 It is thus contended that the housing mix part of Policy HO8 is unsound as it is not justified, not being based on proportionate evidence, and is inconsistent with national policy.
- 11.6 A further problem is that the very prescriptive nature of the proposed mix is the lack of any flexibility on small sites or in locations where the character of the surrounding area needs to be respected to achieve high quality urban design. These factors should be appropriately referenced in the policy to be taken into account in determining the appropriate mix on particular sites.
- 11.7 In order for this policy to be justified and consistent with national policy, it is considered that it should either be deleted or significantly modified in respect of the housing mix. One approach would be to set the percentage figure for each dwelling size as a target and to also identify a more flexible range. For example, the target for 2-bedroom dwellings could be set at 14%, but an acceptable range for new housing schemes could be from 10-20%. Such an approach has been adopted in Leeds Core Strategy of November 2014 under Policy H4 (extract appended). This would provide an appropriate degree of flexibility to balance meeting housing needs with being able to reflect local demand - as required by the Framework.

Housing Standards

- 11.8 Draft Policy HO8 seeks to prescribe housing standards. The PPG provides guidance on policies that seek to exceed minimum standards required by Building Regulations in respect of accessibility and water in the section entitled "Housing: Optional Technical Standards"¹. It also advises that LPAs have the option to set out the nationally described space standards.
- 11.9 Whilst the PPG states that it would be for local planning authorities to set out how they intend to approach demonstrating the need for higher accessibility, adaptability and wheelchair housing standards, it does set out what evidence local planning authorities could use to demonstrate a need to set higher accessibility, adaptability and wheelchair housing standards (reference ID: 56-007-20150327). This includes:
- the likely need for housing for older and disabled people;

¹ PPG Ref ID:56

- size, location, type and quality of dwellings need;
- the accessibility and adaptability of existing housing stock;
- how need vary across different housing tenures; and
- the overall impact on viability.

11.10 Policy H08 requires half of all new dwellings to be built to higher accessibility, adaptability and wheelchair housing standards. It expects that 45% of Market and 40% of affordable housing will be developed to Lifetime Homes Standard and 5% of Market and 10% of affordable dwellings will be built to wheelchair user standards. There is however insufficient evidence to justify this policy requirement.

11.10 The Policy is purportedly substantiated on the Housing Market Evidence 2017 report which identifies that half of the overall population growth will be in people aged over 65 (para 5.32). However, this evidence notes that most of these will already live in the area and many will not move from their current homes. Paragraph 5.33 of the evidence report further notes that a third of the increase in households are likely to have someone aged 65 or over. This evidence does not therefore support a requirement of 50% of homes to be built to lifetime or wheelchair access standard. There is also no evidence that confirms that all people aged over 65 will require properties to be built to those standards, the likely need for housing for disabled people who are not aged 65 and over, the size, location, type and quality of dwellings need, the accessibility and adaptability of existing housing stock and how need may vary across different housing tenures.

11.11 Furthermore, table 6.1 of the Daventry Local Plan (Part 2) Viability Report shows that some sites in some location within the district would find it difficult to deliver the full policy requirements of Draft Local Plan (part 2) when combined with the requirements of Local Plan Part 1. Paragraph 5.33 of the Housing Market Evidence 2017 also advises that requiring 50% of all dwelling to meet category should not compromise viability.

11.12 This part of draft Policy H08 is not justified as it has not been supported by proportionate evidence. The draft policy is therefore unsound.

Space Standards

11.13 A further proposed housing standards requirement in draft Policy HO8 is for the internal floor areas of new build dwellings to meet the National Space Standards as a minimum. Whilst the PPG provides the option for LPAs to require an internal space standard (reference ID 56-018-20150327), it is clear that evidence is required to justify this requirement in terms of need, viability and timing (reference ID: 56-020-20150327).

11.14 The evidence provided in paragraph 5.36 of the Housing Background Paper December 2018 (ref HOU1) shows that after assessing a sample of developments in Daventry District, most house types do not meet the nationally described internal space standards. However, this information does not demonstrate that there is a need across the District for space standards to be applied. As advised by the PPG (reference ID 56-020-20150327), consideration should also be given to whether a transitional period would be required following the adoption of the policy to allow developers to factor in the additional cost of the space standards into future land acquisitions. Furthermore, table 6.1 of the Daventry Local Plan (Part 2) Viability Report shows that some sites in some location within the district would find it difficult to deliver the full policy requirements of Draft Local Plan (part 2) when combined with the requirements of Local Plan (Part 1). This part of draft Policy HO8 is therefore unsound as it has not been supported by proportionate evidence.

Water Efficiency

11.15 Draft Policy H08 also seeks to apply a water efficiency measure limit of 110 litres per person for all new dwellings. Again, the PPG provides for such a water efficiency measure to be applied but only where the LPA can establish a clear need for it (reference ID: 56-013-20150327). It is not considered that the supporting evidence base demonstrates that the full requirements of policy H08 (of which water efficiency forms a part) would be viable across all areas of the District. Table 6.1 of the Daventry Local Plan (Part 2) Viability Report shows that some sites in some location within the district would find it difficult to deliver the full policy requirements of Draft Local Plan (part 2) when combined with the requirements of Local Plan (Part 1). It is concluded that this element of Policy H08 is not justified and therefore fails the test of soundness.

12. *Is there any evidence that any of the policy requirements on Policy HO8 would affect the viability or deliverability of housing sites? Is the policy sufficiently*

flexible? Would it allow for specific circumstances, including viability to be taken into account?

- 12.1 Policy H08 is very prescriptive in the mix and type of housing that are expected to be delivered across the district. These requirements are not supported by robust evidence. There no evidence to support the prescriptive housing mix. There is also no evidence that this prescribed mix would be appropriate for all sites across the District.
- 12.2 The Daventry Local Plan Part 2 Viability Assessment (November 2017) states that it would not be viable to deliver fully policy compliant schemes across all sites in the District. The viability assessment advises that the emerging Draft Local Plan (Part 2) policy requirements may need to provide some flexibility to ensure a fully deliverable plan (paragraph 6.3.2). However, no flexibility has been built into policy H08 to allow this to happen. This Policy is not sufficiently flexible and does not allow for specific circumstances and location in the District to be taken into account. This policy is therefore not sound. Paragraph 6.3.2 of the Viability assessment recommends that applying flexibility to the Draft Local Plan (Part 2) would allow the market to deliver the sites.
- 12.3 In order for this policy to be justified and consistent with national policy, it is considered that it should either be deleted or significantly modified. It is recommended that a flexible range should be used for recommending housing mix. For example, the target for 2-bedroom dwellings could be set at 14%, but an acceptable range for new housing schemes could be from 10-20%. Such an approach has been adopted in Leeds Core Strategy of November 2014 under Policy H4 (extract appended). Furthermore, if the policy was to remain, it should be modified to be locally specific. This would provide an appropriate degree of flexibility to balance meeting housing needs with being able to reflect local demand - as required by the Framework.

Housing Mix

5.2.10 The SHMA 2011 provides evidence of the forecast growth of households and the need for different sized property. By 2026 there is expected to be 45,800 additional single person households and almost 19,500 couple households. Family households (including lone parent families) are forecast to only grow by approximately 4,500 households. Aligning household growth with preferences expressed in the 2007 SHMA survey therefore suggests the following mix of dwelling sizes should be aimed for: 8% 1 bed, 55% 2 bed, 27% 3 bed and 10% 4+ bed (as set out in Fig 6.19 of the SHMA 2011). In terms of the mix of houses and flats, the aim of the Policy is to avoid the excesses of market trends experienced when houses dominated the mix in the 1980s and early 1990s and when flats dominated the mix in the late 1990s and early 2000s. Table 4 below, distils this evidence into a preferred mix for 2012 – 2028.

Type*	Max %	Min %	Target %
Houses	90	50	75
Flats	50	10	25
Size*	Max %	Min %	Target %
1 bed	50	0	10
2 bed	80	30	50
3 bed	70	20	30
4 bed+	50	0	10

*Type is applicable outside of City Centre and town centres; Size is applicable in all parts of Leeds

5.2.11 Policy H4 aims to ensure that the new housing delivered in Leeds is of a range of types and sizes to meet the mix of households expected over the Plan Period, taking account of SHMA preferences and difference in demand in different parts of the City, and changing demand. With this aim in mind, the Policy is worded to offer flexibility. For small developments, achievement of an appropriate mix to meet long term needs is not overriding. The form of development and character of area should be taken into account too. For example, a scheme of 100% flats may be appropriate in a particular urban context. For larger developments it will be appropriate to take account of local housing need in accordance with the principles agreed as part the housing growth debate.

POLICY H4: HOUSING MIX

Developments should include an appropriate mix of dwelling types and sizes to address needs measured over the long term taking into account the nature of the development and character of the location. This should include the need to make provision for Independent Living (see Policy H8).

For developments over 250 units, in or adjoining the Main Urban Area and Major Settlements or for developments over 50 units in or adjoining Smaller Settlements, developers should submit a Housing Needs Assessment addressing all tenures so that the needs of the locality can be taken into account at the time of development.