

DAVENTRY DISTRICT SETTLEMENTS AND COUNTRYSIDE LOCAL PLAN EXAMINATION

PROPOSED CHANGES TO POLICY HO8

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

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Policy HO8: Housing Mix and Type

- 1.1 These submissions are in response to the Council's Policy HO8 Revision Options of 27th June 2019 (EXAM24) and should be read in conjunction with our previous objections to Policy HO8 and our Matter 3 Hearing Statement (Questions 11 & 12).
- 1.2 The proposed additional text at paragraph 6.5.12 should not be included as it is not necessary and requires the reader to be able to view the Housing Background Paper which may not be accessible post adoption.
- 1.3 Proposed new paragraph 6.5.19 states that '**some** components of this policy only apply to developments of 10 or more dwellings', but only the housing mix component would not apply with the changes proposed, thus the remaining components of Policy HO8 would apply and would place an unnecessary burden on such small scale developments coming forward, particularly when the Council's own viability evidence indicates they will be unlikely to be viable. In order to be found sound, the words 'some components of' require deleting from this text such that none of the requirements of Policy HO8 should apply to these small-scale schemes.

Housing Mix - Option B

- 1.4 The Housing Mix Option B is preferred as it will be clear the extent to which any housing proposal accords with this aspect of Policy HO8. There is concern on how Option A policy wording would be applied by development control officers. Whilst it states that regard will be had to the latest housing market evidence summary, the policy does not state what else regard will be given to in agreeing the mix? This does not provide sufficient clarity for applicants. Option C appears more onerous and inflexible than the submitted text.
- 1.5 It is also important to note that the evidence informing the target percentages is far from robust (see previous objections and submissions), such that achieving the precise percentages is not critical. The range identified in Option B is justified in this context as it also allows for market demand to be taken into account, as required by the NPPF at paragraph 50.

Housing Standards

- 1.6 Our objections to the application of Housing Standards remain. These have not been justified by the evidence for the reasons we have previously provided.
- 1.7 On the application of the Optional Building Regulations accessibility standards, the evidence is simply not there to justify the 50% requirement. In the event that the 50% figure is considered to be justified, then the actual percentage delivered should be subject to viability testing.
- 1.8 The evidence does not support the application of the minimum space standards. No assessment has been undertaken of the potential implication of this on the delivery of housing where there is market price-point sensitivity.
- 1.9 There is no evidence that Daventry District is a water stressed supply area to justify the application of the higher water efficiency measures.