

Home Builders Federation

Matter 4

ROTHER LOCAL PLAN EXAMINATION

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Policy DHG3 – Residential Internal Space Standards

Is there sufficient evidence to justify the adoption of the nationally described space standards?

The evidence supporting the adoption of the nationally described space standards is set out in the Space Standards Background Paper published in October 2018. This evidence sets out that the majority of the homes in each of the developments assessed in the Council's evidence meets or exceeds the NDSS and that those properties that are below space standards they are on average no more than 2 sqm below a compliant property (figure 13 of the background paper). The evidence goes on to conclude that the issue could be addressed through the re-designation of non-compliant double bedrooms to single bedrooms which would mean fewer occupants per household but would improve quality.

However, this suggests that the space standards if they were to be applied in Rother would not increase the size or quality of homes but would purely result in a reclassification of such properties. There is no evidence or justification that confirms that introducing the NDSS will improve the quality of housing or that these will improve the living environment for residents. There is also no evidence presented to indicate that homes slightly below space standards have not sold or that such homes are not meeting their owner's requirements. We consider that additional space does not necessarily equal improvements in quality. There must be 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 have the potential to increase issues with overcrowding and potentially lead to a reduction in quality of the living environment.

The HBF consider that just collating evidence of the size of dwellings completed does not in itself identify need as set in the PPG or local demand as set out in the NPPF. It would be expected that the evidence would include market indicators such as quality of life impacts or reduced sales in areas where the standards are not currently being met. 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.

The HBF in partnership with NHBC undertake a Customer Satisfaction Survey 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 2016/17, the most up to date information available, asked how satisfied or dissatisfied the buyer was with the internal design of their new home, 92% of those who responded were either fairly satisfied (28%) or very satisfied (64%). 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.

We consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. This could lead to a reduction in housing delivery, and potentially reduce the quality of life for some residents. 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. Essentially it could mean that those families requiring a higher number of bedrooms will have to pay more for a larger home. 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.

Recommendation

We do not consider that this policy is required, it is considered that local needs can be met without the introduction of the nationally described space standards. However, if the policy is considered to be justified, we would suggest that the policy is made more flexible to allow for support development schemes including smaller well-designed homes where it is required to make a development viable and deliverable. We would suggest the following amendment to policy DHG3:

“The Council adopts the Government’s nationally-described space standard.

All new dwellings (including changes of use and houses converted into flats) should provide adequate minimum internal space in line with the standard.

The Council will consider developments including dwellings below space standards where these are well designed or are required to ensure the viability of the development.”

DHG4 Accessible and adaptable homes

Is there sufficient evidence to justify the requirement for all dwellings to meet category M4(2) – accessible and adaptable dwellings?

PPG (ID 56-07) identifies the type of evidence required to introduce a policy for accessible and adaptable homes, 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. Whilst the Council have provided evidence showing, for example, that there is an ageing population and that just over 10% of the population have their day to day activities limited a lot by a long-term health problem or disability, we do not consider this justification for all homes to be built to part M4(2). We would suggest that a proportional requirement would be more appropriate based on the evidence presented by the Council.

A more proportional response to accessible and adaptable housing is also supported by evidence from the English Home Survey which examined the need for adaptations in 2014/15¹. This study noted that 9% of all households in England had one or more people with a long-term limiting disability that required adaptations to their home and that this had not changed since 2011-12. The survey also found that in 2014-15, 81% of households that required adaptations in their home, due to their long-term limiting disability, felt their current home was suitable for their needs. The study also indicated that those over 65 that required an adaptation to their home were more likely to consider their home suitable for their needs. So, whilst there is an ageing population there may not be a consequential increase in the need for adaptations or more adaptable homes. Many older people are evidently able to adapt their existing homes to meet their needs or find suitable alternative accommodation. A new home built to the mandatory M4(1) standard will therefore be likely to offer sufficient accessibility for the rest of their lives and as such to require all new homes to comply with Part M4(2) is disproportionate to the likely need within the plan period.

The evidence indicates that for the majority of people over 65 homes built to the mandatory standard (M4(1)) will be sufficient to meet their needs throughout their lives. 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 significant majority of people as they get older. This level of accessibility is considered by Government to be sufficient for the majority of people regardless of their age and which is one of the reasons why the Government required this standard to be applied on the basis of needs rather than introducing it as a mandatory element of the building regulations.

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/539541/Adaptations_and_Accessibility_Report.pdf

As such the evidence indicates that some but not all homes should be built to Part M4(2). This would provide sufficient scope to meet the need for such homes whilst also ensuring development design and mix is not compromised by the demand for all homes to be built to the part M4(2).

Policy DHG6 – Self-build and Custom Housebuilding.

Is the requirement for provision for 5-10% of the total number of dwellings on site of 20 or more dwellings to made available as serviced plots for self and custom housebuilders justified by the evidence?

The HBF is supportive of self / custom build for its potential additional contribution to the overall supply of housing. But the Council's approach is only changing housing delivery from one form of house builder to another without any boost to housing supply. For this policy to provide any boost to housing the Council should identify new sites that it can use to deliver self-build housing rather than place this burden on the house building industry. We consider Government guidance on this issue to be more focussed on engaging with land owners to identify appropriate sites rather than requiring plots to be provided on by the housing building industry for self-builders. Paragraph 57-025 of PPG, for example, outlines that the Council should engage with landowners and encourage them to consider self-build and custom housebuilding. As the approach taken by the Council has not given sufficient consideration within the plan to identifying additional sites for self-builders in the DaSA.

We noted in our submission that no evidence had been provided, however, this was an error as Council had clearly set out in paragraph 4.52 the number of entries on their self and Custom Housebuilding register. As of the 1 March 2018 this was 108. However, we are concerned that across the Country the level of need outlined on self-build registers could be inflated and does not reflect demand and the financial ability of some of those on the list to become self-builders. Very little work has been undertaken by Councils to review these registers to ensure that they are a true reflection of the demand for such homes. We have noted that when Councils have revisited their registers in order to confirm whether individuals wish to remain on the register numbers have fallen significantly. This has been the case at the EIP for both the Hart and Runnymede Local Plans. In Runnymede for example more stringent registration requirements were applied in line with national policy and saw the numbers of interested parties on the register fall from 155 to just 3. We could not find any evidence as to whether the Rother DC has revisited its self-build register since its introduction to examine whether those individuals on the list are still interested in, or have a realistic prospect of, building their own home or whether their housing needs have been met either through the acquisition of self-build plot or through the purchase of a new home.

We would therefore recommend that the policy is reframed to encourage the provision of self-build plots which would be more consistent with the Government's intention. Such an approach would also require the Council to take a more

proactive approach to finding land for self-builders that will further boost the supply of housing.

DEN3: Strategic gaps

Are the five strategic gaps and their extent justified with particular regard to Policy HF1 and RY1 of the Core Strategy? Should they include areas that are already developed?

Whilst DEN3 provides additional detail as to how applications for development within strategic gaps will be assessed the Council have also looked to amend the boundaries of these strategic gaps including significant additional areas of land within this strategic designation. We do not consider it appropriate for the Council to amend the boundaries of these gaps through the DaSA on the basis that Council's Core Strategy will be out of date towards the end of this year. Any extensions to the strategic gaps should only be considered against the latest local housing need assessment that is significantly higher than the housing requirement in the current Core Strategy adopted in 2014.

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