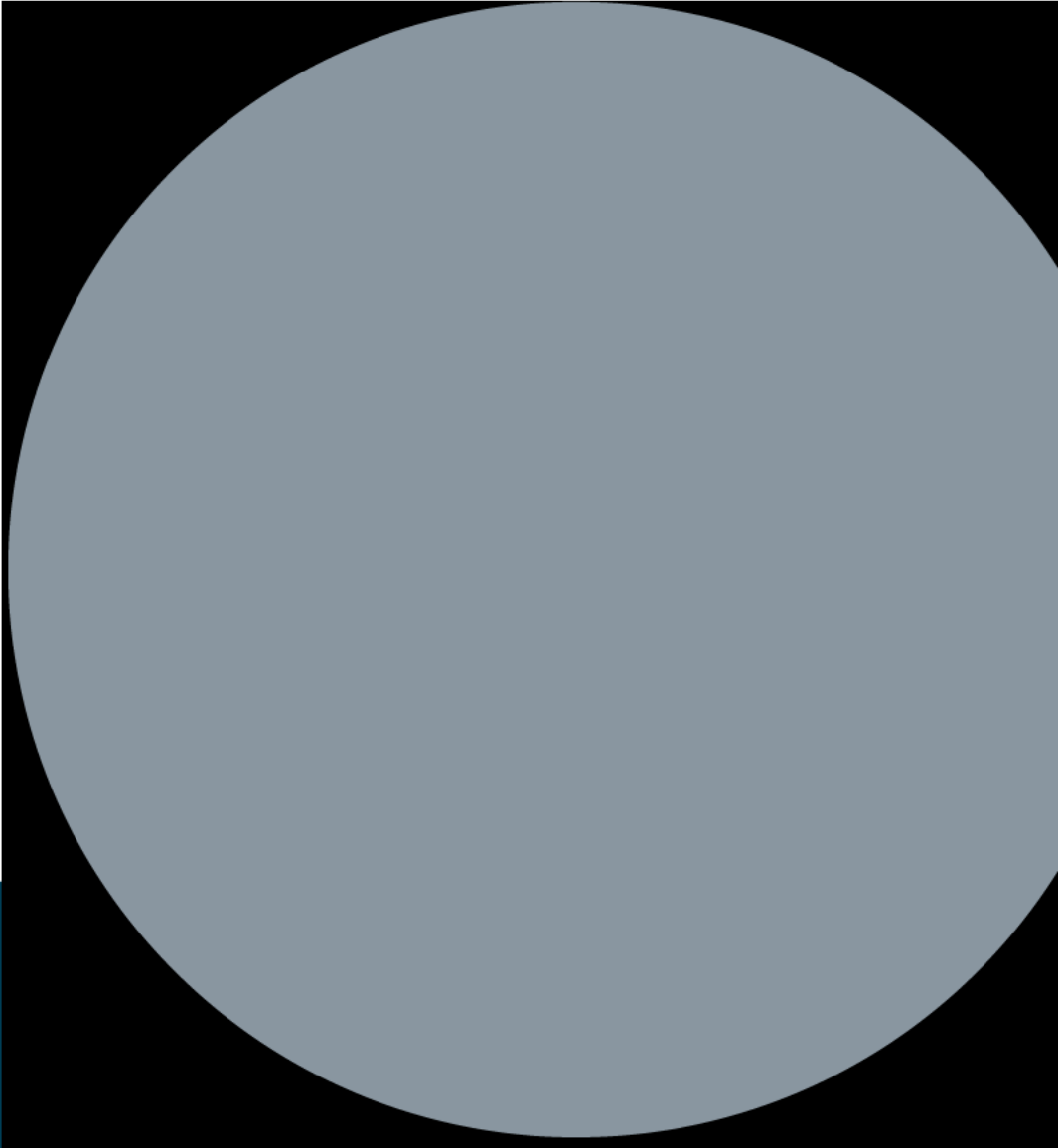




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SOUTH OXFORDSHIRE LOCAL PLAN 2011-2034

FINAL PUBLICATION 2ND VERSION

Representations prepared on behalf of Bloor Homes

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1. Introduction

- 1.1. These representations to the Final Publication Draft 2nd Version of the Local Plan published in January 2019 have been prepared on behalf of Bloor Homes who control land at various locations within the District. In this instance, the principal focus of the representations is on future development at Henley-on-Thames.
- 1.2. Previously submissions were made to the June 2016 Preferred Options, the May 2017 Second Preferred Options, and the first Publication Draft in November 2017. Each concerned, *inter alia*, the approach to future development at Henley-on-Thames.
- 1.3. In the Preferred Option, the Council did not intend for any additional development at the town beyond that identified in the Joint Henley and Harpsden Neighbourhood Plan. In the context of the spatial strategy that the Preferred Option promotes, an approach which sought to constrain growth at Henley-on-Thames was plainly unjustified.
- 1.4. The Second Preferred Option addressed this and set out an approach in line with the spatial strategy which enabled additional development beyond that identified in the Neighbourhood Plan to be accommodated at the town. Our reading of the consultation document was that a minimum of 1355 new homes should be provided at Henley-on-Thames, Thame and Wallingford and that these were in addition to the allocations in the current Neighbourhood Plans, but no specific figure was given to any of the towns. This approach was a better reflection of the role and function of Henley-on-Thames and the expression of the spatial strategy of the emerging Plan as a whole.
- 1.5. In this First Publication draft, a similar approach continued to apply, but individual targets for each of the towns were now specified under Policy H3 for the plan period. This resulted in a reduction in the amount of housing to be provided at Henley-on-Thames. This was due to apparent environmental constraints were applied to the identified residual requirement. In turn the reduction at Henley-on-Thames was redistributed to other settlements. In our representations we challenged the approach of adjusting the requirement to account for conclusions in SHLAA on the basis of errors within it and that there is greater capacity for new housing at Henley-on-Thames than the plan permitted and in accordance with the spatial strategy.
- 1.6. In the current consultation document, the Council retain the level of housing proposed at Henley-on-Thames based on the 15% growth allowance from 2011. But because the plan period is now 2 years longer, the growth rate is now lower. There is no further justification given as to why this is necessary and appropriate. This policy does not accord with the tests of Soundness required of a Local Plan in the NPPF.
- 1.7. In this context, the representations submitted at the present time comment on the following matters:
 - a. the spatial strategy, and the role of settlements and the distribution of new housing;
 - b. the approach to Henley-on-Thames;
 - c. the scale of new housing proposed and the objectively assessed need; and
 - d. comments on other policies.



2. The Spatial Strategy and Policy H3

- 2.1 The Spatial Strategy is based on a strategic objective to support a sustainable settlement hierarchy, including the development of the Science Vale and Didcot Garden Town, the growth of market towns and the vitality of villages (Obj 1.1). It identifies the roles for these locations and where new homes will be built. In doing so it rightly plans to meet the needs identified for South Oxfordshire as well as some of the needs arising from Oxford City.
- 2.2 In turn this is expressed in the proposed strategic policy concerning the Overall Strategy. Para 4.6 suggests that the historic focus of development to the periphery of the District has led to a reduction in development to support the investment in services and infrastructure in other parts, particularly the centrally located heart of South Oxfordshire. Implied within this is some rebalancing; the preferred option for the Council is to principally focus development in the Science Vale and sustainable settlements (which include Towns and Larger Villages), where over 70% of housing will be located.
- 2.3 For the towns (excluding Didcot and the Science Vale), the strategy seeks to support the roles of Henley-on-Thames, Thame and Wallingford by maintaining and improving the attractiveness of their town centres through measures that include environmental improvements and mixed-use developments and by providing new homes, jobs, services and infrastructure (Policy STRAT1).

The suitability of Henley-on-Thames

- 2.4 Henley-on-Thames, Thame and Wallingford are of similar characteristics and are therefore seen as higher order settlements within the District. They are all of comparable size in terms of population – ranging from between 8,000 at Thame and 11,500 at Henley-on-Thames and Wallingford. In the 2011 Settlement Analysis Background Paper, Henley-on-Thames scored 24, whilst Thame and Wallingford both scored 23. Notably Didcot also scored 23, comparable to the market towns, but has been afforded a more strategic role in the emerging documents. The Settlement Audit has recently been updated and its conclusions are no different.
- 2.7 Within the Settlement Analysis Background Paper, Henley-on-Thames is classed as one of only four ‘towns’ in the District alongside Didcot, Thame and Wallingford. This is the highest of four classifications of settlements within the District and provides clear context for the status and strategic role of Henley-on-Thames within the District. The Settlement Assessment classes all settlements within South Oxfordshire District Council against a series of criteria within five distinct categories. These categories are facilities, population, employment, proximity, and public transport. Henley-on-Thames is the highest ranked settlement. The assessment of Henley-on-Thames within each category is summarized in Table 2:



Table 2: Settlement Assessment: Henley-on-Thames

Category	Henley-on-Thames score and ranking	Criteria
Facilities	848 (highest settlement score – greater than Didcot, which scored 700)	Points attributed on basis of provision of facilities
Proximity	10 (settlements scores range between 30 and 0 but only ten of over 100 settlements score more than 10)	Based on proximity to town, cities and large villages, within and outside of District
Public transport	30 (only Didcot and Goring score better)	Based on existence of railway station and frequency of bus services

Source: SODC Settlement Analysis

- 2.6 It is evident that Henley-on-Thames scores very well in terms of facilities, population and public transport. In considering the allocation of housing within settlements, high scores in all three of these categories are of relevance. Though the population figure is a relative consideration in respect of housing allocations, it is generally accepted as an indicator of the status of a settlement. Paragraph 6.6 of the Settlement Assessment recognises that “*with higher populations, a greater range of services and facilities can be supported*”. In respect of the other assessment criteria, it is clear that a settlement with suitable facilities and strong sustainable transport provision underscores its suitability as sustainable and appropriate location for development.
- 2.7 The only category that Henley-on-Thames has not scored highly historically is relation to employment, as it has a low proportion of economically active resident. However, the statistics are skewed in comparison with other similarly sized settlements due to a greater proportion of elderly persons. This cannot reasonable be used to justify a reduced housing allocation. A great many of the recent housing developments within Henley-on-Thames have been for further specialist accommodation, whereas the evidence summarised in the latest Housing Topic Paper is for a greater emphasis on family housing in the future. There is an identified need for additional employment development through the Local Plan and this is to be allocated in the Review of the Neighbourhood Plan. It is also important to note that the lack of new housing at Henley-on-Thames will have caused the labour market to tighten and thus constrained the towns attractiveness as an employment location.
- 2.8 The Sustainability Appraisal (SA) also notes that Henley is the most expensive area in the district to purchase accommodation across nearly all housing types, and is also the most expensive place to rent. This is highly relevant in the context of the importance the Government attaches to improving the affordability of housing and assisting first time buyers into the housing market.
- 2.9 The SA further explains that “*allowing further growth at Henley-on-Thames will help to strengthen the existing employment and services available. It also provides the opportunity to contribute towards meeting the housing needs of the district. Affordability is a key issue in the town and the provision of additional development will bring wider benefits*”.
- 2.10 The above demonstrates that Henley-on-Thames should be considered of equal importance as Thame and Wallingford and this Spatial Strategy, which affords a role to the pre-eminent towns with the District in accommodating new development, is sound as a matter of principle. Accordingly, where there are genuine opportunities for future development that are not constrained by AONB or other factors, these should be allowed for in the housing requirement for the town in Policy H3.



Future Housing Provision at Henley-on-Thames

- 2.10 Later in the consultation document it is explained that the preferred approach is to maintain the principle of a “Settlement Hierarchy”. Para 5.14 states that “*In each of the towns of Henley-on-Thames, Thame and Wallingford the Local Plan proposes the provision of an additional 15% growth of housing stock. This level of growth has been calculated on the basis of the housing stock existing as at 2011-the base date of the Local Plan*”. This is explained in the October 2017 Housing Need and Supply Topic Paper (page 12). No equivalent or alternative explanation is provided in the January 2019 Housing Need, Housing Supply & Housing Densities Topic Paper.
- 2.11 Each of the 2016, 2017 and 2019 consultation documents specify that the housing requirement for Henley-on-Thames is derived from 15% growth rate. This has been a consistent element of the Plan during its inception, although there is no reasoned justification as why this represents an appropriate growth figure. It is instructive to note that this growth rate is the same as that for villages despite their more significant role in the settlement hierarchy.
- 2.12 Significantly however, each of these three plans cover different plan periods. The 2016 Plan covered the period 2011 to 2031; a 20-year period. The 2017 Plan covered the period 2011 to 2033; a 22-year period. The 2019 Plan covers the period 2011 to 2034; a 23-year period.
- 2.13 Whilst the two Publication Drafts cite a requirement of 1285 dwellings for Henley-on-Thames based on this approach, because the plan period is longer, the actual growth rate is lower. Therefore, to be consistent, the amount of new housing to be provided at Henley-on-Thames should be 1343 dwellings, which co-incidentally, is comparable with the 1355 referred to in the 2016 Second Preferred Option (although that was for a 20-year plan period, 2011-2031).
- 2.14 On this basis, Policy H3 should be amended accordingly. Amending this increases the outstanding requirement to be met by in the Neighbourhood Review to 226 additional dwellings.
- 2.15 It is instructive also to consider the nature of the completions and commitments which make up the housing supply figure at Henley-on-Thames.
- 2.16 Planning permission was granted for Townlands Hospital in March 2013, having first been identified for development in the 1997 Local Plan. Table 5a in the consultation document provides the indicative capacity from the 2011 Local Plan as 62 dwellings. The permission is for the redevelopment of a health and social well-being campus comprising conversion and demolition of existing hospital, to provide replacement 18 bed community hospital, 12 bed palliative care facility, 64 care home, 45 assisted living units and key worker apartments. The 45 associated living and key worker apartments correspond with the 62 dwellings as they fall outside the C2 categorisation afforded to the Care Home. However, the Council’s housing trajectory in its Annual Monitoring Report Hospital suggests 110 dwellings will be provided from this site.
- 2.17 The Neighbourhood Plan was made in April 2016, having been prepared over a number of years prior to this. It identifies housing sites for approximately 500 new homes. Of which, planning permission has been granted for approximately 250 dwellings. 160 of these are on the Highlands Farm site (Site M). Of the 11 sites identified in the Neighbourhood Plan 7 have not progressed through the planning system – these 7 provide the remaining half of the Neighbourhood Plan allocation.
- 2.18 Of the sites which have planning permission, with the exception of Highlands Farm, all are almost exclusively flatted development, continuing the trend of housing at Henley-on-Thames in the earlier years of the plan period reflecting the constraint imposed in earlier development plans. A



number of which have been developed or have planning permission for elderly persons care accommodation, amounting to 171 units of specialist accommodation. Similarly, the remaining sites in the Neighbourhood Plan are within the town centre and are likely to constitute flatted development in order to achieve the capacity estimates.

- 2.19 There is considerable uncertainty as to whether the commitments represent a genuine supply of future housing land at Henley-on-Thames which can be relied upon. The effect of this is that the residual requirement for the Neighbourhood Plan to identify is likely to be greater still. On this basis, Policy H3 1(i) should be reflected as a minimum requirement for the Neighbourhood Plan.
- 2.20 The housing supply in the Neighbourhood Plan should therefore be reviewed in order to identify sites which provide a balance of future housing provision with an emphasis upon family housing as evidenced by paras 5.8 and 5.9 of the 2019 Housing Topic Paper.

Lucy's Farm, Henley-on-Thames

- 2.11 In this section we provide summary information about the suitability of land at Lucy's Farm for housing development, drawing upon the published Strategic Housing Land Availability Assessment.
- 2.12 Within the Henley and Harpensden Neighbourhood Plan, the Strategy Diagram (pages 26 and 27) delineates the planning and environmental designation that relate to the town including the AONB and areas of flood risk. Notwithstanding these designations this reveals areas free of constraint to the south of the town. This includes land at Lucy's Farm, east of Gillots School (allocated as Site C in the made Neighbourhood Plan).
- 2.13 In the 2013 Strategic Housing Land Availability Assessment, this site is identified as HEN1 (Appendix 1 refers). This states:
- there is scope to develop the northern most part of the site provided the landscape enhancements to the plateau edge are implemented;
 - development on the northern most part of the site (the reduced site) can be mitigated through setting back the built form away from the plateau edge and substantial woodland planting along the southern boundary. This would achieve a more robust landscape edge to the town to the rear of Blandy's Road which would link well into existing woodland and tree cover;
 - in a short to medium time views of the new urban edge from the AONB would be screened, without introducing inappropriate elements into the landscape;
 - a belt of Green Infrastructure should also be able to provide additional ecological and recreational benefits;
 - density should take account of the low density of the housing to the east, but could approach the density on Blandy's Road along its northern edge, provided the character of a well treed urban edge to Henley is conserved. On this basis some 110 to 130 dwellings might be accommodated; and
 - in principle, OCC Highways & Transport officers would accept development of the number suggested at this location providing access is taken from Blandy Road.



- 2.14 It concludes that the Site is considered suitable in principle as it has no overriding constraints.
- 2.15 In the ARUP Assessment (published in March 2017), the site proforma concludes that the site (now referenced 955) is Suitable, Available and Achievable and gives an indicative capacity of 172 dwellings (Appendix 2 refers). This also confirms that the site is not within the AONB, is not within or adjoining a conservation area, has a very low proportion of BMV, is not within a AQMA, is not subject to any ecological designations and does not include any heritage assets and is not at risk of flooding. It similarly records a “willing landowner” and that the site in an area of market attractiveness determined as “high”. More generally the site adjoins the Neighbourhood Plan allocation at Gillott’s School, this confirming the principle of residential development in this location.
- 2.16 However, the 2017 SHELAA published alongside the First Version Publication Plan, and which is the basis of the adjustment made to the level of new housing at Henley-on-Thames at that time categorizes this site differently (ref 1126). Although there has been no change in circumstance so far as the listed constraints are concerned, or the market attractive of the site, on this occasion the site is referred to Suitable only (ie not Available and not Achievable) (Appendix 3 refers).
- 2.17 This was discussed with the LPA who accept that the categorization should be Suitable, Available and Achievable, and the 2017 Assessment is, in so far as this site is concerned, incorrect.
- 2.18 The 2019 SHLAA concludes that this site is not subject to any intrinsic constraints, does not include any designated heritage assets, does not have any known infrastructure constraints, and benefits from access to the public highway. It is considered appropriate for further assessment and is available for development.
- 2.19 It is also significant to note that the means of access via Blandy Road will enable development at the Neighbourhood Plan allocation at Gillott’s School which would not otherwise be achieved.
- 2.20 This illustrates that there is land available at Henley-on-Thames suitable for residential development that was not considered previously as part of the Local Plan’s capacity assessments. This further justifies the increase in the housing requirement for the town in Policy H3.

Suggested amendment to Policy H3

- 2.21 Having regard to the above we propose that Policy H3 be reworded as follows:

Henley-on-Thames at least 500 new homes. A substantial proportion of these new homes should be for family housing.

Contingency arrangement

- 2.22 In our earlier representations we identified the importance of a contingency provision being included within market towns policy similar to that for villages. We continue to support this, but as we identified in our 2017 representation, the risk of a protracted Local Plan process could mean that the Neighbourhood Plan is not advanced and this is the situation that has come to pass. It might in any event be necessary for planning applications to be considered on the basis of material considerations of which Policy H3 and STRAT1 would both be relevant.



3. Housing Provision

Policy STRAT2 The Need for New Development

- 3.1 The level of new housing proposed in the Publication Plan is derived from the Oxfordshire Strategic Housing Market Assessment with an additional allowance to accommodate unmet need from Oxford City.
- 3.2 Para 4.23 of the consultation document illustrates that the SHMA identifies a total need for between 14,500 and 16,500 homes for South Oxfordshire over the 20-year period 2011-2031. This equates to per annum figures of 725 – 825 dwellings. It further explains that the Oxfordshire Growth Deal requirement of 100,000 new homes between 2011 and 2034 is based upon the SHMA mid-point figure - 775 dwellings.
- 3.3 Policy STRAT2 proposes that the strategic housing requirement is 775 dwellings per annum over the 23-year period 2011-2034. This totals 17,825 new homes.
- 3.4 Added to this is the unmet need originating from Oxford City. On this occasion, the consultation document proposes to accommodate all of the apportionment figure derived from the Memorandum of Understanding in the first instance, namely 4950 homes between 2021 and 2031. This increases the overall housing requirement in Policy STRAT2 to 22,775 additional new homes. (Although we are aware that the recent consultation associated with the Oxford City Local Plan suggests that the unmet need will be greater than assumed previously).
- 3.5 The NPPF requires that a Local Plan's strategic policies should look ahead over a minimum 15 year period adoption. The assumption made in the consultation document is that the Local Plan will be adopted later this year, although this must be seen as highly optimistic. In the likely scenario that the plan is adopted in 2020, the Local Plan should cover as a minimum the period to 2035 – extending the plan period in overall terms to 24 years.
- 3.6 In considering the housing supply strategy, it is imperative that there is sufficient evidence to demonstrate that this number of new homes will be delivered in the plan period ie built. For example, the Growth Deal is concerned with planning for and the supporting the delivery of 100,000 new homes by 2031.
- 3.7 The housing requirement that this Local Plan has to accommodate is a significant step change from the adopted Core Strategy and housing supply to date. On the basis of Table 5c of the consultation document the annual average rate of completions since 2011 has been 623 dwellings per annum. Whereas, the housing requirement that emerges from requires a per annum completion rate in excess of 1,150 dwellings per annum. Put simply, the annual housing output needs to double over the remaining 15.5 years of the plan period. Even taking out the requirement arising from Oxford City's unmet need, which is directly comparable with the build associated with earlier plans the increase by over half.
- 3.8 Table 5c 'Expected Sources of Housing Supply' suggests a total supply of housing land that totals 28,465 dwellings. This suggests a flexibility of some 25%.
- 3.9 On the face of it this appears to be considerable, however, it must be seen in the context of the nature of the housing supply proposed.
- 3.10 Having regard to the housing trajectory in Appendix 1.2 of the Infrastructure Delivery Plan, over 10,000 new homes are required to be built in the 10-year period between 2024/25 and 2034 on large scale strategic allocations:



- Charlgrove 2025 new homes
- Culham 1850 new homes
- Berinsford 1700 new homes
- Grenoble Road 1700 new homes
- Northfield 1800 new homes
- Bayswater Brook 1100 new homes

- 3.11 Grenoble Road, Northfield, Bayswater Brook (and Wheatley Campus) are together estimated to provide 4900 dwellings within the plan period in order to meet the Oxford City unmet need requirement of 4950 additional dwellings for the period to 2031. Appendix 1.2 of the Infrastructure Delivery Plan 'Trajectories for Strategic Allocations' indicates that only 3465 new homes will be built on these sites by 2031; 1500 less than the required contribution.
- 3.12 Accepting of course that there is no means of regulating the housing market, there is a disconnect here if it is assumed that the purpose of these strategic allocations is to meet the Oxford City need figure. On this basis, housing from other locations within the District will be required to contribute towards the Oxford City unmet need figure and as a result reduce the extent to which South Oxfordshire's Objectively Assessed Need is met.
- 3.13 Development at **Culham** is also not without its difficulties, as is acknowledged in para 4.74 of the consultation document. This includes a new River Thames road crossing between Culham and Didcot Garden Town. Again, this raises uncertainties about if and when development here will proceed.
- 3.14 **Berinsford** is also a village that is to accommodate major development and new infrastructure disproportionate to its current scale.
- 3.15 **Policy STRAT5** prescribes minimum densities for locations and sites within the District. It is instructive to note that for the strategic allocations the minimum density is 45dph increasing to 70dph on Grenoble Road and Northfield. In our experience these are not average densities that are likely to be delivered across development of this scale. If the assumed capacity is based on these densities, this again questions the likely number of new homes that will be delivered.
- 3.16 Given the above, there is much less certainty that the number of new homes required in the plan period will be "**delivered**" as is the policy requirement. The housing land supply must be more than a mathematical exercise and must demonstrate how this significant increase in housing provision can realistically be achieved.
- 3.17 In the context of the representations made in relation to Henley-on-Thames, both in terms of its suitability as part of the spatial strategy and its ability to provide housing in excess of the 15% growth rate, additional housing can be directed to this town.
- 3.18 Together this illustrates why a positive approach to identifying housing opportunities should be taken within the Local Plan as suggested for Henley-on-Thames.

Policy H1 Delivering New Homes

- 3.19 Policy H1 indicates that the housing requirement is to be met by either C3 or C2 housing. It is important to recognise that communal populations are excluded from household projections. This is explained in the ONS explanatory note entitled '2016-based household projections for England: changes to methodology'. On this basis we do not agree that the housing requirement should be met by C2 development.



- 3.20 In terms of the location of new development, in the first instance new housing is restricted to sites at Strategic Allocations, existing allocations and on sites allocated by Neighbourhood Plans.
- 3.21 To guide development in sites not allocated in the development plan, other suitable development sites are limited to previously developed land in and adjacent to existing built up areas of towns and larger villages. No greenfield development is permissible in these locations if not allocated in a Neighbourhood Plan.
- 3.22 We welcome the inclusion of the explanation of what will happen where Neighbourhood Plans are not progressed. Clearly, it is presently assumed that this 12-month period is derived from the Local Plan being adopted in 2019. In the event this becomes a protracted period, and the Neighbourhood Plan is not advanced because of this, it might be necessary for planning applications to be considered on the basis of material considerations of which Policy H3, H4 and STRAT1 would be relevant. However, the fourth bullet point of this policy would limit the ability of greenfield sites next to sustainable towns.

Policy H9 Affordable Housing

- 3.23 We note that Policy H9 will require 40% of the residential units to be affordable housing, subject to the viability of this provision on each site. This has been amended from “at least 40%” on the 2017 Publication Draft and we support this. We note that para 5.46 states that the exact amount of affordable housing on each site will be agreed through negotiation between developers and South Oxfordshire District Council, and Policy H9 will be the starting position.
- 3.24 It is important that the Council adopt a sufficiently pragmatic approach so as not to preclude otherwise acceptable development coming forward provision as this will prevent opportunities coming forward, reduce the amount of new housing being provided both market housing and affordable housing and thus increase the incidence of people in housing need. This would be counter-productive to the purpose of the policy in the first instance.

Policy H11 Housing Mix

- 3.25 We support the principle of Policy 11 which seeks to secure to mix of dwelling types and sizes to meet the needs of current and future households. However, it is important to recognise that that needs could change over the plan period and therefore the policy should include sufficient flexibility to cater for changing circumstances.
- 3.26 The requirements in the policy are presently drawn from the 2014 Strategic Housing Market Assessment.
- 3.27 In 2013, the Government launched a review of the various housing standards being implemented by local authorities. This Review culminated in:
- 3.28 The Building Regulations establish a mandatory baseline standards (Category M4(1)) that are to be applied on all new developments across the Country; and a series of optional standards referred to as Category M4(2) and Category M4(3), and minimum internal space standards for new houses.
- 3.29 In summary para 0.3 of the 2016 Building Regulations explains that Requirements M4(2) and M4(3) are ‘optional requirements’ and only apply where they are imposed on new development as part of the process of granting planning permission. Where no condition is imposed, dwellings only need to be meet requirements M4(1).



- 3.30 The 2015 Ministerial Statement accompanying the publication of the new 'Optional Standards', which included the NDSS, confirmed that the reason for publishing the standards was to rationalise the "...many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes."
- 3.31 The Ministerial Statement confirms that the standards are only intended to be optional and that they would only be required and necessary in certain circumstances. Indeed, if the Government had considered that the NDSS were necessary across the Country, they would have formed part of the revised Building Regulations and would have become a mandatory requirement, rather than an optional one.
- 3.32 The NPPG states that Local Planning Authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Local Planning Authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans. It also states that Local Planning Authorities should consider the impact of using these standards as part of their Local Plan viability assessment.
- 3.33 The NPPG sets out clear criteria which must be satisfied in order to adopt optional NDSSs over and above the requirements of Building Regulations. Where a need for internal space standards is identified, Local Planning Authorities should provide justification for requiring internal space policies. Local Planning Authorities should take account of the following areas:
- need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
- viability – the impact of adopting the space standard should be considered as part of a plans' viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.
- 3.34 The guidance effectively sets out three tests which must be addressed to ensure the Optional Standards are only applied where needed and impacts are fully considered.
- 3.35 We do not believe that this level of assessment has been undertaken by the Council to underpin this policy. Certainly, we have not been able to identify anywhere in the Local Plan evidence base where this justification exists and this is not something that is contained in the SHMA. On this basis, and until the level of justification required by the NPPG is available, these requirements must only be treated as indicative figure and not mandatory requirements.
- 3.36 Moreover, there is no evidence that the application of these optional standards have been taken in to account in determining the yield from potential development sites. It is inevitable that plot sizes will become larger in order to accommodate the greater space requirements and in turn this will reduce the density of development.



