

Stevenage Borough Local Plan

Public Examination

Matter 6 Statement

January 2017

Stevenage Borough Local Plan 2011 – 2031 - Public Examination

Statement by Stevenage Borough Council (SBC)

Matter 6 – General housing policies

NB: SBC responses set out in blue font

1. Policies GD1 and SP8 both advise that the Council will implement the Governments optional Technical Standards (THS) and in the case of Policy GD1 reference is made to possible exceeding these standards. Planning Practice Guidance says 'Where a local planning authority (or qualifying body) wishes to require an internal space standard, they should only do so by reference in their Local Plan to the Nationally Described Space Standard' which is what is being done through these policies.

However the PPG goes on to say that '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 plan's 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'.**

Can you provide evidence of this having been done. Also can you please provide the justification for the requirement in Policy GD1(j) to 'where possible, exceed the nationally described space standards'.

- 1.1 Paragraph's 4.33 to 4.38 of the Housing Technical Paper ([ED123](#)) set out the Council's justification for implementing the Nationally Described Space Standards.
- 1.2 Although at the time of viability testing the Council was yet to make a decision on the implementation of space standards, the Whole Plan Viability Study ([TI3](#)) assessed the viability of future housing growth based on these standards being implemented (para 8.6, page 84). As such, its impact on viability has been assessed.

- 1.3 To inform this Technical Paper, evidence was gathered on past housing completions and the room sizes achieved. This found that the majority of residential schemes in recent years have met the minimum space standards (para 6.34). This, again, demonstrates viability within the town to build to this standard. However, the evidence also shows that some schemes have fallen below these thresholds.
- 1.4 Due to the under-bounded nature of the Borough and the lack of available land for development, the Council has asked developers to increase densities on many sites, particularly within the town centre, to help meet OAN. Implementing the space standards seeks to ensure that work to increase densities does not lead to overcrowded and poorly designed properties. The Borough Council places great importance on the quality of life of its residents. Due to the number of new homes being planned within the Local Plan, even a small proportion of new homes being built below these standards could equate to a large number of homes.
- 1.5 As the implementation of these standards is shown to be viable, and due to the fact that developers have been made aware of these standards coming in as part of the Local Plan consultation and examination process, it is not considered that any transitional period is required. Any specific issues raised in relation to the timing of this policy and its implications in terms of land acquisitions can be dealt with on a case by case basis.
- 1.6 In terms of Policy GD1(j)'s requirement to 'where possible, exceed the nationally described space standards', the standards cannot be described as "generous" and it is an aspiration of the Borough Council to further improve quality of life for residents. Its inclusion in the policy is intended to confirm that the Borough Council would not object to higher standards than those specified being implemented.

2. In May 2016 some notes were added to the table in the THS. Do the Council intend to add them to appendix c?

- 2.1 The Borough Council considers that it would be appropriate to update Appendix C to include the notes added to the Nationally Described Space Standards table in May 2016, and/or a reference to the fact that the original document should also be viewed in order to take into account any further updates to the table or its supporting text.

3. Have the space standards been taken into account in the viability assessment?

- 3.1. As detailed further in the answer to question 1 of this matter, the Whole Plan Viability Study ([TI3](#)) assesses the viability of future housing growth based on these space standards being implemented (paragraph 8.6, page 84).

4. Has the impact on affordable homes been considered? Policy HO11 seeks to ensure that at least 50% of all new dwellings are Category 2: wheelchair accessible and adaptable. National Planning Practice Guidance advises that Local planning authorities should take account of evidence that demonstrates a clear need for housing for people with specific housing needs and plan to meet this need. Has the Council carried out a needs assessment? If so please provide the evidence to support this? Has the cost of providing it been included in viability testing?

- 4.1. Paragraph's 6.22 to 6.32 of the Housing Technical Paper ([TP2](#)) set out the Council's justification for implementing additional accessibility standards.
- 4.2. The proposed standard will apply to 50% of homes. Requirements of these standards are largely covered by the Nationally Described Space Standards and The Lifetime Home Standards that are reflected in the modelling.
- 4.3. The evidence available at the time of writing the Local Plan, paragraph's xx to xx of the SHMA, 2013 ([HP5a](#)) recognised that much of the existing housing stock is not wheelchair accessible and that around 12% of current households require wheelchair adaption. As the Local Plan cannot require existing properties to be adapted, it is considered that 50% of all new dwellings should be required to meet Category 2 standards to ensure these existing needs, and those of new residents, are met.
- 4.4. The updated 2016 SHMA update ([ED117](#)) goes beyond this, recommending that all new dwellings meet Category 2 requirements in order to provide flexibility in the market. However, this is just one of a range of evidence studies used to inform the SBLP. Our viability testing, and other evidence, does not demonstrate that requiring 100% of homes to meet this requirement would be achievable or, indeed, necessary.
- 4.5. The viability testing in the Whole Plan Viability Study ([T13](#)) follows the requirements of NPPG Paragraphs 173 and 174 and the PPG, and tests the cumulative impact of all SBLP policies.

- 4.6. The modelling of affordable homes is, like the modelling of market homes, based on the Nationally Described Space Standards, which are factored into the appraisals ([T13](#), Para 8.3 to 8.6).
- 4.7. All housing is also modelled to the Lifetime Homes Standard ([T13](#), para 8.13). This follows the assumption that the additional costs of building to these standards is £11/m². This additional cost is a useful proxy for accessible and adaptable standards.
- 4.8. The HBF has suggested (Page 11 of the HBF response to the Publication consultation of the SBLP, ID: 341653, [LP8](#)) that the cost of building to the additional standards is in the range of £8/m² to £24/m². Although the target for at least 50% of all new dwellings to be Category 2: wheelchair accessible and adaptable was not explicitly been tested in the Study ([T13](#)), the additional costs have effectively been assessed. The £11/m² cost of lifetime homes was applied to **all** homes however this is not the policy requirement and is the equivalent of adding £22/m² on 50% of homes which is near the top end of the HBF's cost range and adequately covers the costs of this policy.

5. *Is there a need to restrict houses in multiple occupation in the borough?*

- 5.1. The SHMA ([ED117](#)) identifies a growth in multi-adult households, which includes Houses in Multiple Occupation (HMOs) (p11, para 2.13). It concludes that there is likely to be a continued (and possibly growing) role for HMOs within the Borough (p11, para 2.16). As such, the SBLP does not seek to restrict HMOs. We recognise that these form an important part of the housing market, particularly for young professionals.
- 5.2. Outside of the Local Plan process, the Council is currently considering the introduction of an Article 4 Direction relating to HMOs. Notice of the draft Direction was published for consultation in September 2016. This does not seek to prevent these types of properties from coming forward. Its purpose is to ensure quality of life is maintained by requiring local parking policies to be complied with. Parking problems exist across the town, which have the potential to be exacerbated if existing policies are not applied.

6. What evidence is there for the need for self-build plots on some allocated housing sites, as required by paragraph 159 of the National Planning Policy Framework? Does the evidence correlate with the quantum being required?

- 6.1. The Housing Technical Paper ([TP2](#)) sets out the Council's evidence in terms of self-build provision (Para's 6.45–6.50). Although this also acknowledges that limited evidence currently exists.
- 6.2. This Paper identifies that the Self-Build Portal register (run by the National Custom and Self Build Association) contains no registered interest for Stevenage, and only a small number of registrations looking for sites within the HMA. However, some demand (for at least 18 plots) has been shown via the register held by the Borough Council since March 2016¹.
- 6.3. The provision of 1% self-build plots on each of the urban extensions would allow for at least 27 building plots to be provided, which is above the current level of demand. The 2016 SHMA update ([ED117](#)) (para's 4.24 – 4.32) considered this target against the evidence available and concluded that it is a reasonable response.
- 6.4. Due to the lack of evidence in terms of future demand, the Council considered a requirement for a higher quantum of self-build plots would be unjustified. The Council also has the benefit of being the land-owner of the majority of smaller sites being allocated within the plan, as well as one of the new sustainable urban extensions that is being proposed. As such, flexibility can be provided by the fact that the Borough Council can bring forward plots under its own land ownership, if a further need arises following the adoption of the Local Plan.

¹ This includes latent demand from previous years before the register was in place. The Borough Council held details of those who had enquired about self-build sites.