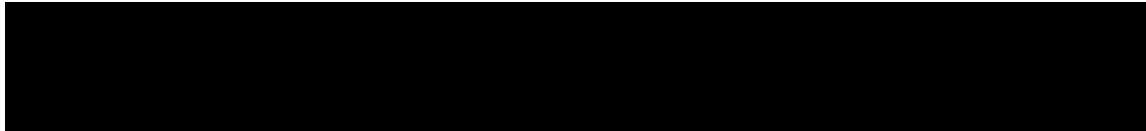


Comment



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Event Name Consultation on the Schedule of Main Modifications
May 2019



Comment ID 9

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Consultation Point Response Form ([View](#))

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Submission Type Web

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To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1

MM26

Do you consider the proposed modification is: . Legally compliant?
(please mark the appropriate box)

If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to? . Is it justified?
. Is it consistent with national policy?

Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?

Introduction

These comments are split into two parts. The first part relates to the proposed introduction of space standards, which Persimmon Homes (Anglia) consider to be unsound insofar that this part of Policy HOU 10 has not been adequately justified as required by national planning practice guidance. Persimmon Homes (Anglia) therefore believe that, in the absence of adequate supporting evidence, this part of Policy HOU 10 should be removed.

The second part relates to the 'accessibility of homes standards', which are proposed for removal from Policy HOU 10. Persimmon Homes (Anglia) consider that this part of Policy HOU 10 has not been adequately justified as required by national planning practice guidance. Persimmon Homes (Anglia) therefore support the removal of this part of Policy HOU 10.

Internal Space in a Home

Persimmon Homes (Anglia) recognise that the provision of sufficient living space within new homes is an important element of good housing design and influences the take up and delivery of new housing. However, insufficient evidence has been provided to demonstrate that local needs are not capable of being satisfied without the introduction of nationally described space standards. Persimmon Homes (Anglia) reiterate the comments already submitted on behalf of the Home Builders Federation (HBF) for Hearing Session: Matter 7.

Initially set out in a written ministerial statement, the Government established the need for LPA's to justify the application of these optional technical standards:

“The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”.

Further to this, the NPPF (footnote 46) states that:

“Policies may also make use of the nationally described space standard, where the need for an internal standard can be justified.”

In respect of this, Persimmon Homes (Anglia) do not consider the Council to have adequately justified the adoption of the Nationally Described Space Standards (NDSS). The reasons for this are set out below, comparable to the comments already submitted on behalf of HBF.

If the Council wishes to adopt the NDSS this should only be done by applying the criteria set out in PPG, which states in paragraph 56-020 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.”

In line with the above, the Council are required to provide an assessment local to Breckland which evidences and justifies the need for the inclusion of the NDSS as a Local Plan Policy. Persimmon Homes (Anglia) contend that, contrary to the guidance set out in PPG, the Council have failed to present any evidence to justify the inclusion of the NDSS as a Local Plan policy requirement. As such, in the absence of any evidence for the adoption of this standard, it should not be adopted.

Whether this policy is viable or not has very little backing from the Council's Viability study, which makes reference to space standards, but fails to explain how these have informed the viability assessments. Persimmon Homes (Anglia)'s place in the market is to provide a range of open market house types and sizes at affordable prices. The need for this housing type is demonstrated by the high uptake in the Persimmon product and high levels of customer satisfaction. If a mandatory space standard were to be imposed upon all new houses, development viability would be affected, likely resulting in inflated sale prices to take account of the increased land take needed to achieve the same number of units on a site and an overall increase in construction costs. This could result in sites that would have previously have been able to come forwards, becoming unviable, which would impact upon the delivery of housing across the district. This is likely to not only disadvantage Breckland District Council in delivering their housing requirement but also those people wishing to get onto the housing ladder with an affordable, high-quality property

Persimmon Homes (Anglia) therefore consider that inadequate regard has been had to how the adoption of the NDSS would affect viability in terms of the resultant impact of potentially larger dwellings on land supply and associated impacts upon affordability.

Accessibility of Homes

Persimmon Homes (Anglia) recognise that the needs of groups of people with specific housing requirements should be addressed as and when they are required as per section 5 of the NPPF. Persimmon Homes (Anglia) have a range of housing types that are able to satisfy part M4 (2) and Part M4 (3) of the Building Regulations if needed, however, support the removal of the accessibility standards from the Breckland Local Plan.

The reasons for this being that there is not always a demand to meet the 20% Part M4 (2) 'accessible and adaptable dwellings' or 5% Part M4 (3) 'wheelchair user dwellings' and thus it is not always viable to have this many accessible units on site when not required. The Council has set out some evidence with regard to the growing numbers of older people and the number of people accessing disabled facilities grants in the district. However, Persimmon Homes (Anglia) would like to echo the comments previously made by the HBF in that 'further evidence on the size, location and type of home needed to meet evidenced needs has not been considered, nor has the accessibility and adaptability of the existing stock or variation of needs across tenure been considered as is required by paragraph 56-007 of PPG.'

The need for the provision of accessible dwellings must be representative of the most up to date information on specific needs in the local area. The desire for accessible dwellings should therefore be assessed on a site by site basis and reflect the needs of the population at the time of submission.

Paragraph 56-007 of the PPG also includes the 'overall impact on viability' in the list of factors that local planning authorities can take into account and consider with respect to providing evidence to demonstrate a need for setting higher accessibility, adaptability and wheelchair housing standards. Persimmon Homes (Anglia) supports the comments made by the HBF insofar that the Council's Viability Study makes no reference to these optional accessibility standards.

Persimmon Homes (Anglia) believe that necessitating developers to meet a compulsory figure percentage of accessible homes, irrespective of whether this figure would be reflective of local need, is likely carry implications for development viability and this has not been taken into account in the draft policy.

Please set out what changes you consider necessary to make the proposed main modifications to the Local Plan legally compliant or sound.

Persimmon Homes (Anglia) support the proposed removal of the 'accessibility of homes standards' from Policy HOU 10 for the reasons outlined above.

Persimmon Homes (Anglia) consider that Breckland Council have failed to adequately justify the need for the introduction of an internal space standard, contrary to Paragraph 127 of the NPPF (footnote 46) and associated guidance contained with Planning Practice Guidance (PPG) Paragraph: 020 Reference ID: 56-020-20150327. Persimmon Homes (Anglia) therefore contend that, in the absence of adequate justification for the inclusion of internal space standard within the plan, the requirement to meet the Government's Nationally Described Space Standard (NDSS) should be removed from Policy HOU 10 of the emerging Local Plan.

Would you like to be notified of future stages of the Local Plan? Yes

How would you like to be notified? . By email to my email address