

Home Builders Federation

ID: 19OTH0036

Matter 16

EPHING FOREST LOCAL PLAN EXAMINATION

MATTER 16: Development Management Policies (DM1 – DM22)

Issue 1: Are the Development Management Policies in the Plan justified, effective and consistent with national policy in respect of the specific matters set out below? Are there any other issues concerning their soundness?

Policy DM10: Housing Design & Quality

22. Does Part A seek to introduce the optional Nationally Described Space Standard? Should this terminology be used? Is this justified by evidence relating to need, viability and whether a transitional period for implementation is required? In respect of viability, what cost has been ascribed to meeting this standard for assessment purposes?

PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states 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.”

The Council therefore need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. However, we could not find any evidence to support the adoption of these standards in the local plan. Therefore, whilst the Council has considered the impact of these standards on viability they cannot be adopted if there is no evidence to suggest that they are needed. Without this evidence the policy must be deleted.

Need is generally defined as ‘requiring something because it is essential or very important rather than just desirable’. The Council seem to suggest that the justification for the policy is a desire to improve the quality of housing for the residents of Epping Forest who deserve high quality homes. However, 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. We consider that additional space does not necessarily equal improvements in quality. There must also 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 therefore have the potential to increase issues with overcrowding and potentially lead to a reduction in quality of the living environment.

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. 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. 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.

We also note that this policy does not appear to include a transition period as set out in the PPG. If this policy is to be retained in the CSSR we would support the inclusion of an appropriate transition period, considering the lead in times for residential from land negotiations to development.

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