



Gladman Developments Limited

Broxtowe Local Plan Part 2 Examination in Public

Hearing Statement in Respect of Matter 5: Housing Size, Mix and Choice (Policy 15)

Issue: Whether the approach to the delivery of housing is justified, effective and consistent with national policy in the NPPF.

Questions

- 1) The ACS in Policy 8.5a sets down an affordable housing requirement of 30% for Broxtowe. What evidence is there to support the local variations proposed in Policy 15?
 - 1.1.1 The adopted ACS sets out an affordable housing requirement of 30%. Gladman have concern that the approach to vary the affordable housing requirement is not aligned with the requirements established in the ACS nor is it supported by any up-to-date viability evidence. The variation to the affordable housing requirement may result in adverse impacts on development viability and would be therefore inconsistent to the requirements of paragraphs 173 - 174 of the Framework.
 - 2) **Is it sufficiently clear what would form 'an exceptional circumstance' to justify off site provision of affordable housing referred to in part 5 of the policy?**
 - 1.1.2 Gladman consider that the policy would benefit from additional clarity either within the policy wording or as a modification to the supporting text. The ability to provide affordable housing off-site is considered to be beneficial as this could allow the delivery of affordable housing to be directed to locations in the highest areas of need.
 - 3) **In part 6 of the policy is it sufficiently clear whether the reference to 'house size' relates to number of bedrooms or to** minimum floor areas set own in the Nationally Described Space Standards?

1.1.3 Part 6 of the policy is not considered to be sufficiently clear in terms of its reference to number of bedrooms or the requirements of the National Described Space Standards (NDSD). Gladman consider that this could be addressed via modification and the following wording is put forward for consideration:

“Developments of market and affordable housing should provide an appropriate mix of houses size, type, tenure and density to ensure that the needs of the residents of all parts of the Borough are met.

ii) Accessible and Adaptable dwellings

4) What local evidence is there to support the requirement of 10% of dwellings in development of 10 or more units to comply with M4(2) of the Building Regulations? What would be the impact on viability?

1.1.4 Gladman previously raised concerns regarding the use of M4(2) standards and the need for further evidence to support its implementation. In this regard, Gladman refer to the PPG which provides additional guidance on the use of these optional standards. The Council need to ensure that this policy is in line with practice guidance and that the justification and specific detail of the policy take account of the various factors which the PPG refers to:

1.1.5 **“Based on their housing needs assessment and other** available datasets it will be for the local planning authorities to set out how they intend to approach the need for Requirement M4(2) (accessible and adaptable dwellings), and / or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:

- *The likely future need for older and disabled people (including wheelchair user dwellings)*
- *Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes, or care homes).*
- *The accessibility and adaptability of existing stock.*
- *How needs vary across different tenures.*

- *The overall impact of viability.*" (PPG ID: 56-007-20150327)

1.1.6 Gladman note that these technical standards have deliberately been set as optional standards which, if to be included as a policy in the LPP2, would need to be justified by robust evidence. Simply put, the fact that there is an ageing population does not necessary provide the justification needed to include a set policy requirement. When considering this policy, the Council need to be aware of what impacts this requirement will have on development viability (due in part to size requirements) and the knock-on effects that this could have on the delivery of much needed housing.

iii) Self-build/custom build

- 5) Is the requirement for 5% of dwellings in schemes over 20 units to form serviced plots for self-build or custom build justified by the evidence? What **level of demand is indicated by the Council's Register? How has scheme viability been assessed?**

1.1.7 In principle, Gladman are supportive of the approach to self-build/custom homes within the Local Plan. This would be in line with current government thinking and objectives. However, it is key that the development industry is able to understand the implications of the above policy, to assist with the design of schemes and the consideration of financial viability.

1.1.8 Notwithstanding the above, no evidence has been provided to assess the level of demand for self-build dwellings and this may place pressure on development viability. The policy should be modified to allow for self-build plots to revert back to market housing as part of a wider scheme after a period of time i.e. 12 months. This will ensure that housing delivery is not stalled where there is no demand for such provision.

iv) Viability

- 6) Having regard to the requirement for affordable housing, accessible homes and self-build/custom build on larger schemes, what is the evidence that cumulatively such provision would maintain scheme viability? In particular in the weaker sub market areas of Eastwood and Stapleford, where a reduced affordable housing requirement is proposed, what evidence is there to demonstrate scheme viability

would be maintained? In a similar way to affordable housing, should a proposal for lesser provision of accessible homes and self-build/custom build also be accompanied by a viability assessment?

- 1.1.9 The above represent important issues which should be supported by robust evidence to ensure that the policies contained in the Plan do not cumulatively result in adverse impacts on development viability. It does not appear that the Council has updated its viability assessment to consider these issues and we therefore reserve the right to comment on this issue at a later stage should the Council prepare additional evidence.