

**EXAMINATION OF BROXTOWE LOCAL PLAN PART 2**  
**MATTER 5 – HOUSING SIZE, MIX AND CHOICE (POLICY 15)**

**Inspector's issues and questions in bold type.**

This Hearing Statement is made for and on behalf of the HBF which should be read in conjunction with our representations to the pre-submission Local Plan Part 2 consultation dated 3<sup>rd</sup> November 2017. This representation answers specific questions as set out in the Inspector's Matters, Issues & Questions document.

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

**i) Affordable housing**

**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?**

Policy 15 requires :-

- 30% or more affordable housing provision on sites of 10 or more dwellings in Awsworth, Bramcote, Brinsley, Stapleford and Toton (as shown on the Policies Map) and any site within the Green Belt ;
- 20% or more affordable housing provision on the newly-allocated site at Kimberley;
- 30% or more affordable housing provision on other sites of more than 10 units within Use Classes C2 or C3 in Beeston submarket ;
- 20% or more affordable housing provision on other sites of more than 10 units within Use Classes C2 or C3 in Kimberley submarket ;
- 10% or more affordable housing provision on other sites of more than 10 units within Use Classes C2 or C3 in Eastwood and Stapleford submarkets.

Under Policy 15 any planning application proposing less affordable housing than set out above must be accompanied by a viability assessment.

The adopted ACS sets out an affordable housing requirement of 30% on sites of 15 or more dwellings in Broxtowe. The HBF is concerned that the Council proposes to vary Policy 8.5a in Policy 15 of the LPP2 without any evidence of updated viability testing. Of particular concern are the proposals to :-

- reduce the size threshold from 15 or more dwellings to 10 or more dwellings ;

- increase the requirement from 30% to 30% or more in the Beeston submarket, Awsworth, Bramcote, Brinsley, Stapleford and Toton (as shown on the Policies Map) and any site within the Green Belt ;
- introduce the requirement on Use Class C2 on other sites of 10 or more units.

Viability assessment is highly sensitive to changes in inputs whereby an adjustment or an error in any one assumption can have a significant impact on viability. It is important that the cumulative burden of these proposed changes is viability tested and made available for public scrutiny. The Nottingham Core Strategy Viability Update Study (September 2013) is somewhat out of date and it does not support the Council's proposed changes in Policy 15 of the LPP2. In the SHLAA 2017/18 it is noted that affordable housing provision across the District averages 25% (excluding 100% affordable housing sites) which is less than the policy requirement proposed. If any updated viability evidence becomes available before the Hearing Sessions the HBF may make further comments orally during the discussion.

**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 down in the Nationally Described Space Standards (NDSS)?**

Bullet Point (6) is not sufficiently clear that house size relates to number of bedrooms rather than NDSS. It is recommended that this Bullet Point is amended as follows :-

6. Developments of market and affordable housing should provide an appropriate mix of house 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 for 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?**

Policy 15 Bullet Point (7) requires that at least 10% of new dwellings on sites of 10 or more dwellings are built to the higher optional standard of M4(2) adaptable / accessible dwellings. The Written Ministerial Statement (WMS) dated 25<sup>th</sup> March 2015 stated that "*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*". If the Council wishes to adopt the higher optional standards for accessible / adaptable homes then the Council should only do so by applying the criteria set out in the NPPG (ID 56-005 to 56-011). All new homes are built to Building Regulation Part M standards. If the Government had intended that evidence of an ageing population alone justified adoption of the higher optional standards then such standards would have been incorporated as mandatory in the Building Regulations which the Government has not done. It is incumbent on the Council to provide a local assessment evidencing the specific case for

Broxtowe which justifies the inclusion of M4(2) optional higher standards and the quantum thereof in Policy 15. Otherwise this Bullet Point should be deleted.

### **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?**

As previously set out the HBF is supportive of encouragement for self and custom build housing provision but object to Bullet Point (8) of Policy 15 which seeks on sites of more than 20 dwellings at least 5% of the dwellings are provided in the form of self or custom build serviced plots and / or custom build dwellings by other delivery routes. The Council has provided no evidence to justify this policy requirement. Bullet Point (8) should be deleted from Policy 15.

If the Council wishes to retain a policy on self and custom build housing the following is suggested :-

8. Developments for self or custom build homes will be supported by the Council.

### **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?**

The requirements for affordable housing, accessible homes and self / custom build will have a cumulative impact on viability. The HBF is unable to answer the Inspector's questions on viability until updated viability testing evidence is made available by the Council. The HBF may comment further orally at the Examination Hearing Session.