

**MATTER NUMER: SC5 – Delivering High Quality Homes, Chapter 7**

**REPRESENTER NAME: Taylor Family/Countryside Properties**

**PERSONAL REFERENCE: 19841**

**REPRESENTATION NUMBERS: Policy H7 -60224**

**Policy H8 – 60319,65821**

**Policy H11 – 60322, 60323, 60324**

**AGENT: Andrew Martin-Planning**

## **South Cambridgeshire District Council Local Plan Examination**

Hearing Statement Matter SC5B:  
Delivering High Quality Homes.  
Development Management.

## **The Taylor Family/ Countryside Properties**

September 2016

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**Our reference**  
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## Introduction

1. For matter SC5B, The Taylor Family and Countryside Properties wish to comment on questions SC5B.1, SC5B.2 and SC5B.5 only. We have accepted the invitation to attend the hearing session for SC5B.5.
2. The Taylor Family and Countryside Properties are committed to ensuring that Bourn Airfield is a high quality new village with good design as a fundamental principle.

# 1. SC5B.1 Policy H/7: Housing Density

**i. Is the wording of the policy too inflexible and prescriptive having regard to paragraph 58 of the National Planning Policy Framework (the Framework)? Should the average densities be regarded as guidelines with the density of individual sites being determined in the context of their location, the character of the surrounding area and the particular site circumstances**

- 1.1 The proposed housing densities in Policy H7 are too limited and inflexible. They are not consistent with National Policy (paragraph 58 of the NPPF). A more flexible approach is required that will ensure an appropriate density for each site that will come from its particular context, including an understanding of site specific circumstances and a response to local character. Appropriate density for an individual site should also consider the need for good design. Any figures quoted should be regarded as guidelines only.

## 2. SC5B.2 Policy H/8: HOUSING MIX

i. Does the policy accord with paragraph 50 of the Framework which requires a mix of housing based on current and future demographic and market trends and the needs of different groups in the community? Is the wording of the policy therefore too inflexible and prescriptive?

ii. Should the percentages in criteria (a) to (c) be reduced and the flexibility allowance in criteria (d) increased?

iii. Is the requirement set out in Section 2(c) of the policy too onerous and too inflexible?

iv. Is the paragraph 3 of the policy justified as the Written Ministerial Statement dated 25 March 2015 requires that Councils should not set in their emerging Local Plans any requirements relating the performance of buildings?

- 2.1 We continue to support representations made in October 2013 and January 2016 that state:
- 2.2 In addition we submit that The Taylor Family and Countryside Properties **object** to paragraph 3 of Policy H/8 on the basis that the ability for local authorities to set requirements for local standards such as Lifetime Homes was revoked following the publication of the Housing Standards Review.
- 2.3 Local Authorities can now only set standards above Building Regulations for water, access, security and space and only in the presence of a sound and viable evidence base to justify local need and viability.

### 3. SC5B.5 Policy H/11 Residential Space Standards for Market Housing

**i. Do the internal residential space standards set out in the policy accord with the DCLG *Technical housing standards-nationally described space standard* document published in March 2015**

3.1 The Taylor Family and Countryside Properties **object** to Policy H/11 as we do not believe that the residential space standards proposed in Policy H/11 accord with the DCLG Technical housing standards-nationally described space standard.

3.2 We elaborate further in paragraphs 3.4-3.17 below.

**ii. The Written Ministerial Letter dated 25<sup>th</sup> March 2015 indicates 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 Framework.**

**Has the need for compliance with the minimum space standards been clearly demonstrated?**

3.3 The Taylor Family and Countryside Properties **object** to Policy H/11 as it is **unsound** and not supported by a robust and viable evidence base. We elaborate further in paragraphs 3.4-3.17 below.

3.4 The Taylor Family and Countryside Properties support the use of the Nationally Described Space Standards (NDSS) where there is a clear local need and where these standards have been correctly assessed in accordance with the Housing Standards Review (HSR), The Written Ministerial Letter dated the 25<sup>th</sup> of March, 2015 and the requirements of the Framework.

3.5 With regards to residential space standards The Written Ministerial Letter states that from the 25<sup>th</sup> of March, local planning authorities can only request the NDSS where there is a clearly evidence local need.

3.6 Following the HSR, The Planning Practice Guidance was updated with the following guidance with regards to the use of the NDSS;

- *The National Planning Policy Framework says that local planning authorities should identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.*
- *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.<sup>1</sup>*

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<sup>1</sup> <http://planningguidance.communities.gov.uk/blog/guidance/housing-optional-technical-standards/internal-space-standards/Paragraph: 019 Reference ID: 56-019-20150327>



3.7 The PPG<sup>2</sup> also provides clear guidance with regards to how local authorities can identify the need for the NDSS in their local plans;

- *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.*

3.8 Paragraph 7.41<sup>3</sup> of Policy H/11 states that;

- *The room size minimums in Figure 10 (The Residential Space Standards for Market Housing) are derived from the upper end of the floor area range given for affordable housing in the Homes and Communities Agency's Housing Quality Indicators (2008).*

3.9 It is therefore clear that the standards are not the NDSS as introduced on the 25<sup>th</sup> of March 2015 (and subsequently updated on the 19<sup>th</sup> of May, 2016<sup>4</sup>). It is also clear that there have been no proposed modifications to Policy H/11 which remains as published as of July 2013.

3.10 The use of the residential standards contained within Figure 10<sup>5</sup> is therefore clearly contrary to The Written Ministerial Statement and subsequently updated PPG which states that local authorities can only use the NDSS if supported by a suitable evidence base confirming the local need and appropriate assessment of viability.

3.11 With regards to the evidence base to justify Policy H/11<sup>6</sup>, it would appear that the only document proposed to support Policy H/11 is *The National Affordable Homes Agency, 721 Housing Quality Indicators (HQI) Form, 2007*. This is a national based policy document that does not consider the local **need, viability or timing** for the NDSS within

<sup>2</sup> <http://planningguidance.communities.gov.uk/blog/guidance/housing-optional-technical-standards/internal-space-standards/Paragraph:021> Reference ID: 56-021-20150327

<sup>3</sup> Proposed Submission South Cambridgeshire Local Plan. Chapter 7 Delivering High Quality Homes. Page 144, Paragraph 7.41.

<sup>4</sup> <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>

<sup>5</sup> Proposed Submission South Cambridgeshire Local Plan. Chapter 7 Delivering High Quality Homes. Page 145, Figure 10

<sup>6</sup> <https://www.scambs.gov.uk/content/evidence-base-and-supporting-studies>

South Cambridgeshire and therefore it cannot represent a **sound** or viable evidence base document.

3.12 The Taylor Family and Countryside Properties note the submission of the joint evidence base document, *Proposed Modifications arising from the Government's Written Ministerial Statement* (Examination reference RD/MC/100). Page 19 of this document states that

- *The Council is undertaking further assessment of the position in relation to the optional technical residential space standard and will feed this into the Examination at the appropriate stage.*

3.13 It is our opinion that in order to meet the requirements of the HSR and the PPG, the Council should have commissioned a suitable evidence base document that meets the requirement of the PPG to confirm the need (or not) for the NDSS and whether this may have an impact upon the viability of housing delivery. This document and then any subsequent revisions to Policy H/11 should have been subject to public consultation prior to this examination.

3.14 The Taylor Family and Countryside Properties have reviewed the space standards within Policy H/11 against the requirements of the NDSS<sup>7</sup> and note several significant differences which include;

3.14.1 Greater minimum Gross Internal Area (GIA) requirements in the NDSS

3.14.2 Higher minimum room sizes within the NDSS

3.14.3 The NDSS requires a minimum in built storage requirement.

3.14.4 The NDSS presents requirements for a greater number of dwellings

3.15 In conclusion therefore, we **object to** Policy H/11 as it is **unsound** as it does not reflect the requirements of the NDSS as established by The Written Ministerial Statement, HSR and subsequent PPG. Policy H/11 should therefore be withdrawn from The Local Plan.

3.16 In addition, the differences between the space standards of Policy H/11 and the NDSS are of such significance that, in the absence of an evidence base document that meets the needs of the PPG, we do not believe that the NDSS can be incorporated within the South Cambridgeshire Local Plan without a new evidence base and subsequent consultation.

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<sup>7</sup> <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>