

Uttlesford Local Plan EIP

Matter 6: Building Healthy and Sustainable Communities

Issue 1: Design, Residential Standards and Dwelling Types

Q1 What evidence is there to justify imposition of optional technical standards for accessible and adaptable housing?

1. For Council.

Q2 Is the approach towards minimum standards of internal space justified and consistent with national policy?

2. Core Policy 55 is consistent with national policy as it uses the Nationally Described Space Standards asset out in PPG. However, HBF could not find any justification as to the need for these standards within Uttlesford. Footnote 52 of the NPPF outlines that these can be used where there is a need for such standards to be applied. While HBF recognises the desire of LPAs to apply such standards it must be recognised that the application of these standard will prevent well designed smaller more affordable homes from coming forward reducing the housing offer within an area. If the Council are to restrict the flexibility of developers to bring forward a wider range of homes, there must be some evidence presented that poor quality homes are being built well below reasonable standards.

Q3 Has the need for affordable housing been justified by evidence? What is that need and would the Plan meet it in full or in part?

3. No comment.

Q4 Is the proportion of affordable housing within a scheme based on net or gross development? Is it applicable to all forms of major residential development, including specialist housing for the elderly and custom and self-build housing?

4. For council.

Q5 Is the proportion of affordable housing sought viable for most types of housing development, both by itself and also in combination with other planning requirements in the Plan?

5. The outcome of the viability assessment would suggest that the proportion of affordable housing is generally viable. However, as set out in our representations HBF are concerned that the Council have underestimated the cost relating to both BNG and the proposed energy efficiency standards. In addition, the Council will also need to consider the impact of the Building Safety Levy which, in the Government's response to the latest consultation, will see development pay £18.12 per m² on PDL and £36.25 per m² for land that is not PDL.

Q6 Is it clear in what exceptional circumstances off-site provision or a financial contribution in lieu would be appropriate?

6. No comment.

Q7 Is the tenure mix justified by evidence? Why is the exact tenure split to be a matter for negotiation when the need for affordable housing in the district is most effectively met through the specified tenure split? Is the requirement for different tenures consistent with national policy?

7. No comment.

Q8 Should there be greater flexibility in the clustering of affordable housing with a housing development?

8. Yes. While HBF understands the desire of the council to ensure affordable housing is not clustered in a single area decisions as to the location of affordable housing should also have regard to the practical management of these homes by registered providers. It may be the case that it is more appropriate for large numbers of affordable housing be clustered in one area. The flexibility to deliver affordable housing in a way that supports the registered provider is essential given the financial difficulties facing many RPs are present. To ensure some degree of flexibility HBF would suggest that the fifth paragraph is amended to read "*Where possible affordable dwellings should be appropriately distributed throughout a new development, ideally in groups not larger than ten units ...*"

Q9 What is meant by a 'continuous frontage of or concentration of' houses in multiple occupation or conversions?

9. For council.

Q10 How is demand for custom and self-build housing calculated? Will the approach to providing land for custom and self-build housing meet the demand?

10. For council.

Q11 Is the requirement for a proportion of custom and self-building plots to be provided in large housing developments justified?

11. For council.

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