## Mansfield Local Plan Examination Hearing Papers

Main Matter 6



Prepared on behalf of The Lindhurst Group April 2019

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## MANSFIELD LOCAL PLAN EXAMINATION

## **HEARING PAPERS**

MAIN MATTER 6 – Whether or not the proposed housing allocations are soundly based and deliverable, whether other housing policies are soundly based and whether a 5 year supply of land can be provided on adoption and throughout the plan period

*Issue – Is the housing site selection process based on a robust assessment against relevant criteria?* 

1.0 It is considered that Policies H3 and H6 will meet the housing needs of different groups. However, the reference to dwelling size in the policy wording of Policy H3 should not be construed as the Council attempting to introduce the Nationally Described Space Standard for which the Council has provided no supporting evidence. It is understood that the Council is not adopting the optional higher standards for accessible and adaptable homes.

The Housing Needs of Particular Groups Final Report dated April 2018 by JG Consulting (Document H3) demonstrates that in Mansfield, older persons in the population and projected change in population of older persons between 2013 – 2033 percentages align with figures for Nottinghamshire, East Midlands and England (see Figures 5.1 & 5.2). All new homes are built to Building Regulation Part M Category 1 (M4(1)) standards which include level approach routes, accessible front door thresholds, wider internal doorway and corridor widths, switches and sockets at accessible heights and downstairs toilet facilities usable by wheelchair users. These standards are not usually available in the older existing housing stock and benefit less able-bodied occupants. These standards are likely to be suitable for most residents. There is no justification for optional higher standards which have not been viability tested.

Issue – Will the plan provide an appropriate choice and mix of housing to meet the needs of different groups in the community? (Policies H3, H4, H5 & H6)

2.0 It is considered that the relevant Policies in the Plan will provide an appropriate choice and mix of housing to meet the needs of different groups in the community.

However the reference to dwelling size in the policy wording of Policy H3 should not be construed as the Council attempting to introduce the Nationally Described Space Standard for which the Council has provided no supporting evidence.

It is understood that the Council is not adopting the optional higher standards for accessible and adaptable homes. The Housing Needs of Particular Groups Final Report dated April 2018 by JG Consulting (Document H3) demonstrates that in Mansfield, older persons in the population and the projected change in population of older persons between 2013 – 2033 percentages, align with figures for Nottinghamshire, East Midlands and England (see Figures 5.1 & 5.2).



All new homes are built to Building Regulation Part M Category 1 (M4(1)) standards which include level approach routes, accessible front door thresholds, wider internal doorway and corridor widths, switches and sockets at accessible heights and downstairs toilet facilities usable by wheelchair users. These standards are not usually available in the older existing housing stock and benefit less able-bodied occupants. These standards are likely to be suitable for most residents. There is no justification for optional higher standards which have not been viability tested.

Issue – Will the plan provide a 5 year supply of specific deliverable housing sites on adoption and is there a reasonable prospect that this will be maintained throughout the plan period?

In responding to this question, the council should provide a worked table of the 5 year requirement based on 325 dwellings per year and the deliverable 5 year supply position against the 5 year requirement.

3.0 It is considered that the Plan will provide a 5 year supply of specific housing sites on adoption. However, any worked table provided by the Council should be robust and take account of a realistic supply of deliverable sites, as well as the number of dwellings which can be delivered from those sites within the 5 year period.

Issue - Is the provision in Policy H5 for at least 5% of the dwelling plots on sites of more than 100 dwellings to be provided for self build or custom build homes appropriate and what evidence justifies the threshold of 100 dwellings? What evidence is available to demonstrate the level of interest in these types of dwellings?

4.0 It is considered that the provision of at least 5% self/custom build plots on sites of more than 100 dwellings set out in Policy H5 Bullet Point (1) is not appropriate. Under the Self Build & Custom Housebuilding Act 2015, the Council has a duty to keep a Register of people seeking to acquire self/custom build plots and to grant enough suitable development permissions to meet identified demand.

The NPPG (ID: 57-025-201760728) sets out ways in which the Council should consider supporting self/custom build. These are:-

- developing policies in the Plan for self/custom build ;
- using Council owned land if available and suitable for self/custom build and marketing such opportunities to entrants on the Register ;
- engaging with landowners who own housing sites and encouraging them to consider self/custom build and where the landowner is interested facilitating access to entrants on the Register; and
- working with custom build developers to maximise opportunities for self/custom housebuilding."

As a consequence, a specific policy requirement for at least 5% self/custom build plots on residential development sites of more than 100 dwellings should **not** be sought. This policy requirement seeks to place the burden for delivery of self/custom build plots on developers, contrary to national guidance which outlines that the Council should engage with landowners and encourage them to consider self/custom build. The Council's proposed policy approach should not move beyond encouragement by requiring



provision of self/custom build plots on residential development sites of more than 100 dwellings.

It is considered that the Council's policy approach should be realistic to ensure that where self/custom build plots are provided, they are delivered and do not remain unsold. It is unlikely that the allocation of self/custom build plots on large housing sites of more than 100 dwellings can be co-ordinated with the development of the wider site.

Eight allocated housing sites for 1,907 dwellings are affected by Policy H5 which potentially provides at least 95 self/custom build plots. Presumably the three SUEs, including the one at Berry Hill, will also be required to provide further self/custom build plots too, which suggests an over-supply against minimal demand. There is also a potential supply of self/custom build plots from the Council's 38 dwellings per annum windfall allowance.

In order to make the Policy sound, it is considered that bullet point (1) should be deleted from Policy H5 as proposals for self/custom build housing are supported by the Council under bullet point (2) of Policy H5, which accords with the approach set out in the NPPG. If bullet point (1) is retained, then the policy should be modified to encourage, rather than require. The marketing period should be shortened to 6 months and the reference to self/custom build plot selling prices should be deleted.

Issue - Will the plan provide a 5 year supply of specific deliverable housing sites on adoption and is there a reasonable prospect that this will be maintained throughout the plan period?

5.0 The residual housing requirement between 2019/20 – 2033/34 is 4,446 dwellings based on the completion of 2,054 dwellings between 2013/14 – 2018/19, as set out in the housing trajectory in the Technical Housing Paper Addendum (H2). It is important to remember that forecast completions of 510 dwellings for 2018/19 are estimated rather than actual figures, which should be confirmed as correct as soon as possible by the Council. This should preferably be before the Matter 6 Examination Hearing Session.

