

Matter 10 Statement

10.2 Delivering Quality Homes (Policies DEV9, DEV10 and DEV13)

i The Written Ministerial Statement Planning Update March 2015 (WMS) sets out the government's national planning policy on the setting of technical standards for new dwellings. It states that the new optional national technical standards should only be required if there is an evidenced need and where their impact on viability has been considered. Policy DEV9 refers to the building regulations optional access standards M4 (2) (accessible and adaptable dwellings) and M4 (3) (wheelchair user dwellings), whilst Policy DEV10 refers to the internal space standard (Nationally Described Space Standard (NDSS)). Are Policies DEV9 and DEV10 consistent with the WMS? In particular:

a. The policies state that the standards apply across the plan area. Whilst document HO10 provides evidence for Plymouth, is there similar evidence for the rest of the plan area?

b. Are the standards justified by robust evidence: on what basis have the proportion of dwellings and the size of schemes been determined?

c. Is the use of the terms 'at least' and 'where possible' appropriate within the policies: does it provide certainty?

- 1.1 In response to points a and b, evidence should be required in recognition for the local demographic needs and the impact this may have on the ability and necessity for developments to meet national technical standards.
- 1.2 Regarding point c, flexibility should be established through the policy approach to ensure that site-specific and scheme-specific considerations can be dealt with, however, there is ambiguity in the terms 'at least' and 'where possible', nor is it clear how these possible concessions to the policy may be applied by applicants or assessed by the LPA.
- 1.3 Paragraph 154 of the NPPF requires that:
'... Only policies that provide a **clear indication** of how a decision maker should react to a development proposal should be included in the plan.' (emphasis added)
- 1.4 Therefore, we consider that as drafted, currently, the policy approach does not provide clarity and does not accord with the NPPF. Whilst it is recognised that it is not possible to specify every possible application of the policy, some broad principles including: site-specific conditions, market conditions and area demographics could be used to form the basis of arguments for any non-compliant schemes.