



Hart Local Plan: Strategy and Sites 2016 – 2032

**Council Response to
Inspector's Matters and Issues for
Examination**

Matter 8

**Other Housing Types and
Related Policies**

25 October 2018

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Housing Mix – Policy H1

8.1 Is criterion b) based on a robust assessment of viability? Has the viability assessment underestimated the cost?

- 8.1.1 Yes, the assessment is robust. Criterion (b) seeks 15% of new affordable homes to be built as accessible and adaptable homes, as defined by Part M4(2) of the building regulations. “The Whole Plan and CIL Viability Study - Addendum January 2018” (ECO3d) includes a cost of M4(2) to 15% of dwellings on different sizes of site (5, 10, 50 and 250 dwellings). An extra over-cost per unit was applied, in addition to the base BCIS cost. This extra cost came from the EC Harris report “Housing Standards Review – Cost Impacts September 2014” (HOU9). The cost applied for M4(2) was £520 per unit, with a further £330 added for water standards, as taken from a DCLG Cost Review 2011, totalling £850. The viability study (ECO3d) concludes at paragraphs 3.48 and 3.50 that the cumulative impact of the Council’s policies, including Part M4(2) standards, should not impede development within the plan areas for mainstream housing. The earlier viability study “The Whole Plan and CIL Viability Study – December 2016” (ECO3a) suggests there is a potential buffer of £300 per unit due to lower than anticipated water costs (paragraph 13.3).
- 8.1.2 No, the viability assessment has not underestimated the cost. The viability reports did not assume any additional revenue for the M4(2) units as it is considered that the market would be prepared to pay an additional sum for this adaptability.
- 8.1.3 Paragraph 171 of the local plan refers to providing evidence of the impact on project viability if the proposal does not include at least 15% accessible and adaptable homes. This can take into account any increase in build costs but also an increase in sales values which can enhance viability.

8.2 Is criterion c) effective and who will consider if it is appropriate to include specialist/supported accommodation?

- 8.2.1 Paragraph 172 of the supporting text refers to larger sites being expected to incorporate an element of housing which meets the needs of older people and people with support needs. The onus should be on the applicant to incorporate an element of older persons’ accommodation at an early pre-application stage through dialogue with the Council. There is no specific site size mentioned as the mix and type of dwellings in a proposal will vary and so will the propensity for providing an element of specialist and supported accommodation. This could comprise sheltered or extra care housing in Use Class C3 or residential/nursing care in Use Class C2. The site will need to be large enough to accommodate such housing together with other types of housing for younger and more able residents, including 40% affordable housing in accordance with Policy H2. There are no examples of such sites to date as the policy has not yet been fully endorsed.
- 8.2.2 There is a link between Policy H1 (c) and Policy H4 “Specialist and Supported Accommodation” where paragraph 198 of the supporting text refers to assessing the proposed mix of housing tenures, sizes and types. Housing for older people should be considered where a demographic assessment indicates a need. The Council will work with partners such as Hampshire County Council and the North East Hampshire Clinical

Commissioning Group to identify suitable sites and secure the provision of schemes in conjunction with landowners and developers who are promoting new residential developments.

8.3 Is criterion d) consistent with national policy?

- 8.3.1 In delivering a choice of high quality homes, paragraph 50 of NPPF 2012 says local authorities should plan for a mix of housing based on different groups in the community including *people wishing to build their own homes*. Criterion (d) also reflects paragraph 159 of NPPF 2012 which says local authorities should assess all types of housing needs in their area including, amongst other groups, *people wishing to build their own homes*. This assessment should form part of the evidence base. The SHMA (HOU1a) assessed the context for self and custom builders and other specific groups in section 14 and at paragraph 14.70 concluded that it is very difficult to quantify the level of self building in the housing market; although each year there are various completions of single dwellings which are likely to have been self-built or developed by builders commissioned by individuals wishing to build their own home.
- 8.3.2 The Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) places a duty upon local authorities to keep a register of individuals and associations of individuals who wish to acquire serviced plots of land to bring forward self-build and custom housebuilding projects.
- 8.3.3 The Hart Self Build Register was established in 2015 as an “expressions of interest” register to understand the potential demand in Hart for self build and custom housebuilding. Various details were submitted by individuals including size and type of dwelling sought, and parish area(s), but no evidence was required to be submitted in relation to, for example, local connection to Hart or sufficient resources to acquire a plot. There were 115 individuals on the register in February 2018.
- 8.3.4 A report to Cabinet on 1 February 2018 considered options for introducing a local connection test and a financial solvency test in order to make the register more robust and meaningful. Individuals and organisations who satisfy the local connection test would be entered on Part 1 of the register, reflecting local demand, and those who did not meet this test would be entered on Part 2 of the register reflecting a general demand. The other tests which would need to be met in all cases were being over 18 years old, nationality and a financial solvency test to ensure an applicant has sufficient resources to acquire a plot. In April 2018 a new webpage was introduced highlighting the eligibility tests, an application form and a fee payable.
- 8.3.5 Existing applicants on the expressions of interest register were contacted and informed of the eligibility criteria and new application form. If they wished to retain their interest on the register they were asked to re-apply in light of the guidance. At September 2018 there were 8 individuals on the Hart Self Build Register. The Cabinet report acknowledged that self build housing would not deliver significant numbers of housing but it was one means of delivering much needed homes.
- 8.3.6 The term ‘self-build’ can be used to refer to a wide range of approaches to creating a bespoke home, the level of input from the individual can range from a complete DIY project to employing contractors to build to your specification. The Council would like to see larger development sites incorporating plots / serviced plots for self-build housing, and

criterion (d) of Policy H1 reflects this aim. The Council will support provision of self-build in line with national guidance, through policies in this plan and through neighbourhood plans. Criterion (d) is therefore considered to be consistent with national policy.

8.4 What is meant by ‘suitable site’ in criterion d)?

- 8.4.1 “Site suitability” in criterion (d) is not prescriptive as residential proposals will be considered on a case by case basis and determined on their merits. However, suitability issues to assess would include the development layout and type of dwellings proposed on the site. A block of flats would not be feasible to have a proportion of self build as the flat(s) could not be separated for a self build purpose. The demand for self build is normally 3/4/5 bed houses which need their own plot and hence a proposal needs to comprise sufficient house plots so the 5% self build quantum can be achieved.
- 8.4.2 Other matters to be taken into account when considering a site which may be suitable for self build housing include the size of site, density and massing. These would be in addition to normal Development Management considerations for housing generally such as pedestrian and vehicular access, relationship between buildings, residential amenity and landscaping.

8.5 Are the thresholds set out in criterion d) justified? What evidence is there to suggest they are appropriate?

- 8.5.1 The threshold of “20 or more dwellings” is considered a reasonable minimum site size for proposals to provide a proportion of self build plots. The policy will be applied flexibly whilst recognising that it becomes more feasible to accommodate self build and custom housing plots on larger sites.

- 8.5.2 As an example, a proposal of 20 dwellings would comprise:

1	self build (5% of 20)
11	market homes (60% minus the 5% for self build)
<u>8</u>	affordable homes (40%)
20	

A further example of 50 dwellings would comprise:

3	self build (5% of 50)
27	market homes (60% minus the 5% for self build)
<u>20</u>	affordable homes (40%)
50	

- 8.5.3 When a qualifying site is triggered by the 20 dwellings threshold, the 5% quantum of self build is based on the total number of dwellings i.e. the proposed development. The examples above show the self build figures being part of the market housing mix as the onus is on house builders to provide and market the self build plots. There may be opportunities however for a Registered Provider to deliver self build plots in conjunction with the 40% affordable housing element but the 5% proportion is still based on the total number of dwellings.

- 8.5.4 The Whole Plan and CIL Viability Study - Addendum January 2018 (ECO3d) considered a 5% quantum of self build plots and concluded that the cost to the developer would be limited to servicing the plots thereby saving build cost, finance cost and reducing sales exposure. Selling the plots at an early stage would also enhance viability but there would be a loss of sales revenue from the completed houses. An assessment of self build plots and costings concluded that the self build/custom build element of the policy was viable, and hence appropriate.
- 8.5.5 The threshold of “20 or more dwellings” and the 5% quantum for self build and custom housebuilding on qualifying sites are therefore justified and appropriate.

8.6 The supporting text at Paragraph 176 sets out that if self/custom build plots are not taken up after two years, the Council will allow them to revert back to conventional building plots. The Council has proposed a modification to one year. Is that an appropriate time period?

- 8.6.1 The marketing timescale of two years in paragraph 176 received several objections that it was too long a period. Such plots would be advertised and marketed where there is an identified need such as on the Hart Self Build Register. This would be a targeted audience of potential purchasers who had already expressed an interest in this type of housing product, so a two year period was seen as unduly long. A reduced time period of one year was considered more realistic and practical for a house builder to attract potential purchasers and secure a sale of the self build plot(s), and is the subject of minor modification Mod 33.
- 8.6.2 A one year time period is considered sufficient time for a house builder to market to individuals and organisations on the self build register, and more widely through websites and publications as they would for standard market housing. Marketing at a realistic price should be undertaken. If there is insufficient interest initially, the one year period allows scope for involving a Registered Provider to acquire the plots instead and engage households to deliver the plots as affordable housing. A shorter time period of say, 6 months, is unlikely to be sufficient to allow these various options to be fully explored and an interested buyer found.

8.7 Is the supporting text at Paragraph 178 setting out policy?

- 8.7.1 No. The first bullet point in paragraph 178 refers to support for self build projects within settlement boundaries. Support for new market housing within settlement boundaries is the main focus of Policy H1 and this bullet point merely supports that policy.
- 8.7.2 The second bullet point refers to requiring self build and custom plots in the new settlement with reference to Policy SS3. Criterion (f) of Policy SS3 specifies self build and the bullet serves as a cross-reference.

- 8.7.3 The third bullet refers to subsequent policies and site allocations in any subsequent development plan documents, which may support proposals for self build and custom build. This highlights the Council's intention to encourage this type of housing in the future, ongoing from that referred to Policies H1 and SS3 of this local plan, in order to deliver other forms of housing products to meet the needs of the local community.
- 8.7.4 Consequently, the supporting text in paragraph 178 is not setting out policy but explains how it will be implemented.

8.8 Provisions set out in the Housing and Planning Act 2016 now include a duty (under Section 8 of the 1985 Housing Act) for local authorities to consider the need for moorings for houseboats. Has the Council considered such matters within its consideration of housing need?

- 8.8.1 Paragraph 1.7 of the SHMA (HOU1a) acknowledges paragraph 50 of NPPF 2012 which says local authorities should deliver a wide choice of high quality homes, and plan for a mix of housing based on different groups in the community. The SHMA makes reference to houseboats but there is no information presented on this matter. There is no reference to moorings or houseboats in the NPPF 2012 or NPPF 2018, but the Housing and Planning Act 2016 includes a Section 124 "Assessment of Accommodation Needs" including places on inland waterways where houseboats can be moored.
- 8.8.2 Basingstoke Canal traverses the district and is governed by Hampshire and Surrey County Councils for recreational purposes. The canal is a Site of Special Scientific Interest (SSSI) for its unusual water chemistry, aquatic plants, dragonflies and bat habitats. The bylaws which regulate the use of the canal require that any vessel moored for more than 72 hours is required to have a mooring agreement. There are no moorings for residential use as people should only stay on their boats during the course of navigation, and this arrangement is likely to continue. Static houseboat moorings is not a core purpose of the canal ownership and no suitable sites have been identified.
- 8.8.3 There are four rivers in Hart. The River Hart and River Whitewater traverse the district, Blackwater River lies to the north and Lyde River to the west. None of these are wide enough or deep enough to accommodate large boats, only small recreational craft.
- 8.8.4 Consequently the need for moorings for houseboats on a permanent residential basis has been assessed but such moorings are not considered necessary or appropriate in the context of waterways in Hart district.

Specialist Housing – Policy H4

8.9 What are the identified needs for housing for older people, particularly residential institutions (Use Class C2)?

- 8.9.1 The SHMA (HOU1a) presented data from Housing LIN Strategic Housing for Older People (SHOP) analysis toolkit which estimates the requirement for specialist housing for older people. The model assumes certain rates of provision of each type of specialist accommodation per 1,000 people in the 75+ age group. It also applies population projections to estimate how the requirements will grow over time. A summary of the outputs from the SHOP model (using the standard settings) is shown in the Figure 14.10, page 212 in the SHMA 2016 (HOU1a).
- 8.9.2 The SHOP figures indicate a requirement for 6,570 specialist housing units over the period from 2014 to 2035. This is an average of 313 dwellings per annum. The majority of the requirement is for sheltered and extra care housing and equates to around 200 units per annum. This provision can be considered as part of the mainstream requirement for housing.
- 8.9.3 The need for residential and nursing care accommodation (typically Class C2 in planning terms) is additional as the demographic modelling does not take account of growth in the institutional population. The Housing LIN model estimates a requirement of around 120 units per annum for residential and nursing care. This is a higher estimate than that produced by the demographic modelling of 80 per annum (Figure 14.9, page 212 in the SHMA 2016), but of the same order of magnitude.
- 8.9.4 Question 8.10 below presents these Housing LIN estimates and updates the need for different forms of accommodation for the plan period, taking into account what has been delivered in recent years (see paragraph 8.10.9 below).

8.10 Does the Plan do enough to ensure that the needs of older people are met?

- 8.10.1 Topic Paper: Accessible Housing (core document reference TOP5) has been prepared to clarify issues relating to accommodation for older people, which reflects Objective 4 of the local plan:

*“To provide new homes of a mix of types, sizes and tenures to meet the current and future needs of Hart’s residents, including affordable housing; new homes and **care accommodation to meet the needs of an ageing population**, and homes for other specialist groups.”*

- 8.10.2 The vast majority of older people will live in mainstream housing all of their lives. It is important, therefore, that new mainstream housing is provided which is accessible and adaptable to the needs of older households. In light of the evidence in the SHMA, it is appropriate to refer to housing standards which address the needs of older persons and/or those who have mobility issues. Building Regulations Part M4(2) “Accessible and Adaptable Housing” and Part M4(3) “Wheelchair User Dwellings” are optional standards, rather than

mandatory standards as in the case of Part M4(1) “Visitable Dwellings”. So it is necessary to incorporate Part M4(2) and M4 (3) standards in the local plan and this been done in various ways.

- 8.10.3 Policy H1 “Housing Mix: Market Housing” criterion (b) says that on sites of 5 or more dwellings 15% of market housing homes should be accessible and adaptable as defined by Part M4(2). Criterion (c) refers to specialist and supported accommodation where appropriate which reinforces the Part M4(2) reference. Policy H2 “Affordable Housing” also seeks 15% of the affordable homes to be accessible and adaptable as defined by Part M4(2), in criterion (d). This would ensure that there is an element of accessible and adaptable accommodation across all tenures.
- 8.10.4 In addition, criterion (e) seeks a proportion to be suitable for wheelchair users as defined by Part M4(3). The latter will be negotiated on a site by site basis and relevant households will be identified using evidence from the Council’s Housing Register such as those who need ground floor accommodation and/or have specified that they use a wheelchair. The costs of building wheelchair housing are higher due to larger building footprints, different internal arrangements and special needs equipment.
- 8.10.5 As this accommodation would be part of the affordable housing quota, costings and issues can be taken into account by a Registered Provider when confirming an offer with the housebuilder. An “Affordable and Accessible Housing” Supplementary Planning Document is being drafted which will inform developers and Registered Providers of all affordable housing requirements including design issues for wheelchair housing, adapted accommodation and bungalows. This document will provide supplemental guidance to Policies H1 and H2 when they are found sound.
- 8.10.6 Policy H4 “Specialist and Supported Accommodation” supports proposals for accommodation which meets the needs of older persons or others requiring specialist care on sites within settlements, or in the countryside. The policy supports a range of accommodation as specified in the SHMA - Use Class C2 includes residential care and nursing care homes, Use Class C3 includes sheltered housing and extra care housing.
- 8.10.7 In the local plan’s monitoring framework, monitoring of Objective 4 includes ensuring that the mix of completed dwellings is in accordance with the SHMA and that 15% of total homes delivered is accessible housing and meets Building Regulations Part M4(2).
- 8.10.8 Policy SS3 “New Settlement at the Murrell Green/Winchfield Area of Search” will comprise many new homes and criterion (f) refers to specialist provision for the elderly and a mix of housing in accordance with relevant local plan policies and up to date evidence. A Development Plan Document will be prepared in conjunction with a masterplan to clarify, amongst other matters, the range of dwelling types, sizes and densities. Paragraph 150 includes reference to specialist accommodation for the elderly. Monitoring of the new settlement will occur under Objective 3 with adoption of the DPD and subsequent delivery of new housing.

8.10.9 A summary of the SHMA requirement for older persons' housing, supply and outstanding requirement 2018-2032 is shown in the table below:

Accommodation Type	Requirement 2014 - 2035 (21 yrs)	Requirement 2032-2035	Requirement 2014-2032	Supply - completed April 14 - March 18	Supply - PP U/C	Supply - PP N/S	Total Supply	Outstanding 2018 - 2032 (14 yrs)	Annual Target
Sheltered	1090 (52/yr)	156	934				67	867	62
Affordable				3					
Private				64					
Enhanced Sheltered	302 (14/yr)	42	260				0	260	19
Extra Care	164 (8/yr)	24	140				237	-97	0
Affordable									
Private				186	51				
Residential Care	685 (33/yr)	99	586				61	525	38
Affordable									(beds)
Private				36		25			
Nursing Care	472 (22/yr)	66	406				124	282	24
Affordable									(beds)
Private				124					
TOTAL	2713 (129/yr)	387	2326	413	51	25	489	1837	131

8.10.10 The requirement 2014-2035 is taken from Figure 14.10 of the SHMA (HOU1a), split into 5 different accommodation types, and totals 129 homes per year. As the local plan period runs to 2032 and not 2035, the last 3 years have been taken off. An assessment of older persons' housing which has been completed April 2014 – March 2018, together with planning permissions which are under construction (U/C) or not started (N/S), gives a total supply of 489 in the first 4 years. The revised outstanding requirement is for a period of 14 years 2018-2032 giving an annual requirement of 131 homes for all older persons' housing. This figure comprises 81 homes for sheltered (62) and enhanced sheltered (19) and 62 beds for residential care (38) and nursing care (24).

8.10.11 Through the various measures outlined above and proper monitoring of policy implementation, the local plan will ensure that the needs of older people are met.

8.11 Is criterion b) i) overly onerous?

8.11.1 The need for older persons' accommodation is evidenced in the SHMA (HOU1a) and the majority of such proposals would be expected to be located within settlements. They would form part of the urban fabric, be convenient for residents to access services and facilities, and feasible for new residents to feel part of the community. It should only be in rare cases that a site located outwith a settlement is considered and hence there should be adequate justification put forward to support the proposal. Criterion (b)(i) is not considered overly onerous but does need to be properly addressed - evidence should be provided that urban sites have been thoroughly tested on a sequential basis in relation to town centres, services and facilities outwards to the edge of settlements. They should be assessed for availability, deliverability, site size and access. There should also be a proven unmet need for the type of accommodation proposed by comparing anticipated supply with the SHMA requirement for such accommodation.

8.11.2 If Policy H4 gave more emphasis to rural sites instead of locations within settlements, this would give the wrong message to developers and landowners, and could lead to a propensity of proposals in more remote locations instead of within built up areas.

8.12 Is criterion b) ii) justified and is it of relevance to all types of specialist and supported accommodation?

- 8.12.1 It is justified in that a proposal should not be wholly self-contained and divorced from the nearby community but rather it should relate well to the existing built up area. A degree of access to existing local services and facilities in the nearby settlement would be convenient for the new residents but will be dependent on their mobility and health. This would create a sense of belonging within the community and minimise any feelings of isolation. The site should also be accessible for those staff who are low paid and may rely on public transport to travel to and from their place of work.
- 8.12.2 Criterion (b)(ii) should apply to all types of specialist and supported accommodation covering a spectrum of housing needs. It is recognised that these can range from sheltered housing where residents live mainly independent lives whilst sharing some communal facilities, to extra care housing and to care homes where on-site personal health care is more intense for vulnerable residents. Accommodation can fall within Use Class C2 or Class C3 depending on its nature and scope.

Internal Space Standards – Policy H6

8.13 Is the requirement for all developments (needing planning permission) to meet or exceed the nationally described space standards justified?

- 8.13.1 National Planning Practice Guidance, with regard to Housing Optional Technical Standards states that: “Local Planning Authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard (NDSS). Local Planning authorities will need to gather evidence to determine whether there is a need for additional standard in their area and justify setting appropriate policies in their Local Plans”.
- 8.13.2 The Policy has been drafted to accord with national policy and is supported by local and regional evidence. The justification for the Policy is set out in detail in the Topic Paper: Internal Space Standards for New Homes, June 2018 (TOP3).
- 8.13.3 Planning Practice Guidance (2015) Paragraph: 020 Reference ID: 56-020-20150327 [Online] sets out that local planning authorities should provide justification for requiring internal space policies, taking account of ‘need’, ‘viability’ and ‘timing’.
- 8.13.4 As outlined in paragraphs 15-24 in the updated topic paper the Council analysed dwellings from 13 sites with planning permissions granted between July 2014 and April 2018, some of which have been built. In total the gross internal floorspace area of 177 dwellings was obtained. The evidence shows that a high proportion of newly built and permitted dwellings in Hart District, particularly in the affordable housing sector, fall short of meeting the NDSS. The Council therefore considers that based on the evidence there is a clear justification for Policy H6 and it is consistent with national policy.

8.14 Does the Council's topic paper on the matter provide clear local evidence in terms of need?

- 8.14.1 As explained in question 8.13 above the Council's topic paper outlines the methodology which was used to undertake a local need assessment in the District to establish a need for the Policy to apply the NDSS. The local evidence from the assessment does clearly indicate a need for the application of the NDSS in the District.

8.15 Is Policy H6 based on a robust assessment of viability?

- 8.15.1 This is dealt with in paragraphs 23-24 of the topic paper (TOP3a). The Whole Plan and CIL Viability Study 2016 (and Addendum 2018) assumed the development will adopt the NDSS. The finding was that adoption of the standards will not affect the viability of proposed developments.
- 8.15.2 The cost impact study of introducing the standard issued by the Government alongside the Housing Standards Review provided an analysis of evidence on increasing the space standards in new homes. The finding was that this would not significantly affect viability or the affordability of homes.

8.16 Is the Council's approach to not including a transitional time period justified?

- 8.16.1 It is not considered necessary for the Council to apply a transition period following adoption of the new local plan policy. As explained in paragraph 25 of the topic paper the NDSS were established in March 2015 and developers are well aware of the requirements. Most developers are already building to the NDSS.

8.17 To be effective, should Policy H6 include some flexibility?

- 8.17.1 It is not considered that setting space standards would have a significant impact on viability, as demonstrated by the local evidence. Introducing flexibility into the policy to allow dwellings which would not meet the standards would make it less robust and harder to achieve the aims of the policy to reduce overcrowding and improve the quality of life of the residents of the District. As explained in paragraphs 13-14 of the topic paper (TOP3a) having sensibly sized properties for affordable housing would allow the Council and Registered Providers to allocate the stock to a wider range of households.