Folkestone & Hythe District
Places and Policies Local Plan

Main Matter 6 – Policies HB1 to HB14 – Housing and the Built Environment

Statement made on behalf of the Local Planning Authority

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Inspector’s Questions

• Are the Housing and the Built Environment Policies justified by appropriate available evidence, having regard to national guidance, and local context, including the CS?

• Does the local plan make sufficient provision for inclusive design and accessible environments in accordance with paragraphs 57, 58, 61 and 69 of NPPF?

Council’s Response

Are the Housing and the Built Environment Policies justified by appropriate available evidence, having regard to national guidance, and local context, including the CS?

Introduction

1. The Housing and Built Environment (H&BE) Policies set out in the Places and Policies Local Plan (PPLP) are listed below:

   • Policy HB1: Quality Places Through Design;
   
   • Policy HB2: Cohesive Design;
   
   • Policy HB3: Internal and External Space Standards;
   
   • Policy HB4: Self-build and Custom Housebuilding Development;
   
   • Policy HB5: Replacement Dwellings in the Countryside;
   
   • Policy HB6: Local Housing Needs in Rural Areas;
   
   • Policy HB7: Dwellings to Support a Rural-based Enterprise;
   
   • Policy HB8: Alterations and Extensions to Residential Buildings;
   
   • Policy HB9: Annexe Accommodation;
   
   • Policy HB10: Development of Residential Gardens;
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- Policy HB11: Loss of Residential Care Homes and Institutions;
- Policy HB12: Development of New or Extended Residential Institutions (C2 Use);
- Policy HB13: Houses in Multiple Occupation (HMOs); and
- Policy HB14: Accommodation for Gypsies and Travellers.

2. The local planning authority considers that the above policies are justified by appropriate evidence, having regard to national guidance, the local context and prevailing policy, particularly the adopted Core Strategy (CS) (2013). Information to support this statement is presented herein.

Evidence Base

3. The council has a strong record of working with partners to assess design quality and in particular has worked with Design South East to increase skills and knowledge in the local authority. The council has also implemented a Design Review for a number of strategic and smaller applications and will continue to promote this through Planning Performance Agreements and other means where appropriate.

4. The PPLP is underpinned by a relevant and up-to-date evidence base which supports the site allocation and development management policies. The evidence base has been prepared through a combination of in-house studies and external reports to ensure the policies are justified. The full list of evidence base documents is available to view on the council’s website: https://www.folkestone-hythe.gov.uk/planning-policy/local-plan/places-policies/evidence.

5. Specifically, the H&BE Policies HB1–HB14 are justified by the following evidence base documents:
   - The Building Regulations;
   - Strategic Housing Market Assessment of East Kent (SHMA) (2009);
   - Sustainability Appraisals (2015, 2016 and 2018);
   - DCLG Fixing Our Broken Housing Market;
   - Nationally Described Space Standards (2015);
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- Building for Life 12;
- Building Research Establishment’s (BRE) Site Layout Planning for Daylight & Sunlight (2011);
- Sandgate Design Statement (2013); and
- East Kent Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2014).

6. In addition to these evidence base documents, the policies are entirely consistent with the Core Strategy, the National Planning Policy Framework (NPPF) (2012) and Planning Practice Guidance (PPG).

Policy HB1: Quality Places Through Design

7. The NPPF (2012) places quality design at the heart of the planning system, making it clear that good design is a key aspect of sustainable development and place-making, indivisible from good planning (paragraph 56). Further detail is provided in Core Strategy policies, particularly Policy SS3: Place-Shaping and Sustainable Settlements Strategy. The PPLP seeks to meet the NPPF (2012) requirement for “robust and comprehensive” design policies that “establish a strong sense of place” (paragraph 58), and seeks to provide more detail to policies in the Core Strategy.

8. The specific criteria in Policy HB1 (1–6) deal with issues of inclusive design and accessible environments, and ensure high quality design remains a key aspect of all new development in the district, in accordance with paragraphs 57, 58, 61 and 69 of NPPF. Additional criteria relating to character, legibility, public realm and amenity in Policy HB1 also support the Building for Life criteria in Policy HB2. The council’s response to Main Matter 6 (Question 2) provides a more robust assessment of Policy HB1.

Policy HB2: Cohesive Design

9. The H&BE Policies contained within the PPLP suitably cross-refer to relevant national policy, as evidenced in paragraphs 9.25 to 9.27, which cite the NPPF (2012) and Building Regulations. Expanding further, Building for Life (BfL) 12 is the latest iteration of the government-endorsed industry standard for well-designed homes and neighbourhoods by Cabe (now merged with the Design Council). Paragraph 129 of the NPPF (2012)
ensures that local planning authorities have access to, and make appropriate use of, tools and processes for assessing and improving the design of development, including frameworks such as Building for Life.

10. The council has used the BfL criteria to inform Policy HB2: Cohesive Design. 12 BfL criteria are grouped under three themes: Integrating into the Neighbourhood; Creating a Place; and Creating Streets and Homes. Detailed consideration of the BfL 12 standard will help to ensure that a comprehensive approach is taken to the design of new housing developments in the district; conforming to paragraph 129 of the NPPF.

Policy HB3: Internal and External Space Standards

11. Doc 4.3 (Table 1) Nationally Described Space Standards sets out the minimum gross internal floor areas and storage requirements (m²). The council has adopted the Government’s discretionary Technical Housing Standards – Nationally Described Space Standards (2015) in Policy HB3: Internal and External Space Standards in order to improve the quality of new homes and ensure that new developments in the district provide adequate space for residents, in accordance with national guidance.

12. While many new developments have met or exceeded these standards in the district, many one and two bedroom dwellings are falling short, and the council will particularly scrutinise applications for Houses in Multiple Occupation (HMO) against these standards to ensure that proposals provide acceptable living space for these residents. Additional criteria for HMO developments are stated in Policy HB13: Houses in Multiple Occupation to tackle this particular local issue, specifically in the urban area of Folkestone.

13. PPLP paragraph 9.34 sets out a formula to calculate the amount of amenity space that should be provided for communal gardens. This formula is used to calculate minimum sizes for individual private open spaces in neighbouring local authority Ashford Borough Council’s Residential Space and Layout Supplementary Planning Document (SPD). However, the council has noted that a table from this SPD, which informed the formula in Paragraph 9.34, was removed from the PPLP prior to the publication of the Preferred Options draft, which inadvertently removed the context in which the calculation was formulated. For this reason, and given that the evidence supporting this formula relates to a neighbouring local authority, together with the lack of clarity surrounding this formula; it is suggested that the formula and paragraph 9.34 should be deleted as a modification.
to the PPLP, and that communal gardens be assessed on a case-by-case basis through the planning application process.

14. Policy criterion HB3 (2) establishes standards for private amenity areas for new residential development in the district, contributing significantly to the achievement of the Core Strategy’s strategic objectives, particularly in terms of design and contributing to the improvement of health and quality of life for those living in the district. In the case of private gardens attached to a house, a minimum area based on the 10 metre long ‘rule of thumb’ x the width of the dwelling provides a helpful starting point. A minimum depth of 10 metres provides a very modestly-sized garden, but as covered in supporting paragraph 9.32, in most cases can accommodate a storage shed, a sitting out area, washing line or rotary drier, planting and play and amenity space. These features can make a garden attractive, support people’s health and wellbeing, and provide valuable habitats for wildlife.

15. The ultimate aim of this policy is for applications to demonstrate how adequate private amenity and play space can be achieved either by separation of dwellings or design and layout. For this reason, and depending on the specific characteristics of individual sites, the council accepts that certain circumstances may require a degree of flexibility on this 10 metre requirement, and therefore it is suggested that some flexibility is inserted into the policy wording as a modification to the plan.

Policy HB4: Self-build and Custom Housebuilding Development

16. The NPPF (2012) requires local planning authorities to deliver a wide choice of high quality homes (paragraph 50), and ensure that they use an up-to-date evidence base to address their housing needs and the needs of different groups in the community, including people wishing to build their own homes (paragraph 159).

17. While the council's Strategic Housing Market Assessment for the East Kent Sub-region (2009) (Doc 3.1) did not identify those people wishing to build their own homes as a specific group, Planning Practice Guidance (PPG) (2017) effectively advises that “relevant authorities should consider how they can best support self-build and custom housebuilding in their area”, and that this could include “developing policies in their Local Plan for self-build and custom housebuilding” (paragraph: 025).
18. CS Policy CSD1 encourages new housing (class C3) in accordance with CS Policy SS3 (optimising distinctiveness, appeal, sustainability and accessibility) where it contributes to the creation of balanced and popular neighbourhoods through high-quality design proposals. Furthermore, CS Policy CSD2 plans for an appropriate housing mix within the district. Policy HB4 therefore conforms to the aims and aspirations of CS Policies CSD1 and CSD2.

19. The Self-build and Custom Housebuilding Act (2015) places a duty on the council to keep a register of people who are interested in self-build or custom build projects in the district, which was subsequently followed by the Self-build and Custom Housebuilding Regulations 2016 on 1st April 2016.

20. At the time of writing, there are 163 individuals on the council’s Self-build and Custom Housebuilding Register. PPG (Paragraph: 023) advises that relevant authorities must give permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their areas, and that relevant authorities have three years in which to give permissions to an equivalent number of plots of land, which are suitable for self-build and custom housebuilding as there are entries for that base period (PPG Paragraph: 023).

21. Given the level of demand in the district, Policy HB4 sets out requirements for the provision of self-build and custom housebuilding plots as part of larger new developments in the Urban, Romney Marsh and North Downs character areas. It is anticipated that the site allocations in the PPLP will provide at least 36 self-build and custom build plots by 2031, which is likely to be further supplemented by ‘windfall’ development of smaller sites, below five dwellings (PPLP, paragraph 9.42).

22. The criteria set out in Policy HB4 also include design parameters and a requirement that the plots be appropriately marketed for at least 12 months before the plots can return to open market units. The council considers that the policy, as a whole, provides sufficient flexibility and the requirement for a 12 month marketing period is a widely applied timeframe that is not overly restrictive and will provide sufficient time for those who are on the council’s self-build register to express their interest. The inclusion of Policy HB4 is therefore entirely consistent with updated national policy guidance and best practice.
Policy HB5: Replacement Dwellings in the Countryside

23. The NPPF sets outs in paragraph 55 that, in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. The PPG specifically covers rural housing and advises that it is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements (paragraph: 001). CS paragraph 4.66 acknowledges that planning must reflect the predominantly rural nature of the district. Policies HB5–HB7 acknowledge the rural nature of the district in accordance with the CS.

24. The NPPF (paragraph 55) states that local planning authorities should avoid isolated new homes in the countryside unless there are special circumstances. CS Policy CSD3 considers that rural development outside of the Settlement Hierarchy may only be allowed if it is essential. Policy HB5 details the policy criteria for replacement dwellings in the countryside in accordance with paragraph 55. Policy criterion HB5 (2) sets out the design parameters for this development, while preceding paragraphs 9.45–9.47 clarify the council’s position on replacement dwellings in the countryside in support of Policy HB5.

Policy HB6: Local Housing Needs in Rural Areas

25. The viability of local communities and local facilities, such as shops and schools, can be threatened if local people, particularly young families, are unable to afford to stay in an area. The NPPF supports local housing needs; as paragraph 54 states, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate.

26. Policy criterion HB6 (2) provides the local need to be clearly identified by a detailed parish survey and the size, mix and tenure of the dwellings should help to meet the identified need; whilst criterion HB6 (3) ensures that the development will be designed and available at a cost capable of meeting the identified local need. Supporting text to Policy HB6 in paragraphs 9.48–9.53 explains further about rural exception sites and the assessment of local need.
Policy HB7: Dwellings to Support a Rural-based Enterprise

27. Section 6 of the NPPF (2012) sets out the Government’s policy for supporting a prosperous rural economy. Paragraph 81 seeks policies to be flexible enough to accommodate needs not anticipated and allow for new and flexible working practices (such as live-work accommodation).

28. The Government’s ‘Towards a one nation economy: A 10-point plan for boosting productivity in rural areas’ also touches on this issue and seeks the improvement of conditions for people to live and work in rural areas, as this would help create more flexible labour markets.

29. Policy HB7 seeks to accommodate the needs of new enterprises in the rural area and provide accommodation for workers. The policy is consistent with CS Policy CSD3: Rural and Tourism Development in Shepway, which seeks to address the needs of small settlements and businesses in the rural area.

Policy HB8: Alterations and Extensions to Residential Buildings

30. Section 7 of the NPPF (2012) requires good design. Paragraph 56 of the NPPF states that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making places better for people.

31. Extensions to existing buildings can have a detrimental impact on neighbouring properties or on the character of an area as a whole. Unsympathetic extensions can affect the outlook of, and natural light of, habitable rooms of neighbouring properties. The Heritage Strategy (Doc 12.1) has identified that minor changes to properties can have a cumulative detrimental impact on an area’s setting. Theme Paper 13 covering Conservation Areas (Appendix 1 of the Heritage Strategy) has identified that unsympathetic alteration is a significant negative factor in all but one of the conservation areas appraised. Whilst this is a concern for areas identified as having a special character, it is also true of other non-designated areas. Policy criterion HB8 (7) reflects the Heritage Strategy to ensure that alterations and extensions do not result in unacceptable harm to heritage assets (whether designated or not) or their setting.
32. Furthermore, the NPPF (paragraph 59) states that design policies should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally. All criteria of Policy HB8, applied together, will guide the overall design of new extensions and alterations in accordance with paragraph 59 of the NPPF. In addition, the council has adopted best practice from The Building Research Establishment’s (BRE) document ‘Site Layout Planning for Daylight and Sunlight: A guide to good practice’ (2011) which sets out the 25 and 45 degree tests. The use of these tests will ensure that extensions are of an appropriate scale, massing and height in accordance with paragraph 59 of the NPPF.

Policy HB9: Annexe Accommodation

33. Following feedback to the PPLP Preferred Options Draft (2016) consultation, it was suggested by colleagues in the Development Management team that a standalone policy relating to annexe accommodation would be beneficial for the district. As a result, a planning policy officer led a focus group with Development Management colleagues on 5th October 2017 to discuss the wording and pre-amble for a new policy relating to residential annexes. The specific wording of criteria specified within Policy HB9 was derived from extensive experience gathered from officers in the Development Management team in assessing, providing feedback and seeking modifications to ‘real world’ proposals for residential planning applications, in order to make proposals acceptable.

34. The justification for standalone annexes to be supported by evidence of need in policy criterion HB9 (9) is to prevent the formation of separate dwellings in potentially isolated locations that would otherwise not be acceptable in accordance with other design, transport and community policies in the PPLP and would result in new dwellings with sub-standard living conditions or without adequate independent living space, amenities, access and/or car parking.

Policy HB10: Development of Residential Gardens

35. The NPPF makes it clear that local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area (paragraph 53).
36. Policy HB10 relates to the complete or partial redevelopment of residential garden land within settlement boundaries. The definition of Previously Developed Land (PDL) in the Glossary to Annex 2 of the NPPF specifically excludes land in built-up areas such as private residential gardens, which would apply to applications under HB10. With regards to garden land within the countryside, it is accepted that this could be considered ‘brownfield’ land under the definition of PDL and therefore paragraph 111 of the NPPF, which affirms that brownfield land should be prioritised, could apply. However, as the NPPF is taken as a whole, the council considers that the principles of sustainable development would be applied, and the countryside is provided with adequate protection by the NPPF to prevent the loss of residential gardens in rural locations.

**Policy HB11: Loss of Residential Care Homes and Policy HB12: Development of New or Extended Residential Institutions (C2 Use)**

37. Given the demographic profile of the district and the historic development of its coastal settlements, many care homes and institutions have been established in the district. However, with the changing nature of the industry and the requirement for improved service provision, and for larger sites to increase the viability of businesses, the council anticipates significant changes in the building stock over the plan period. Policy HB11 seeks to prevent the loss of residential care homes and institutions whilst Policy HB12 sets out criteria for new or extended residential institutions. The context surrounding residential care development in the district is specified in supporting paragraphs 9.77-9.84 of the PPLP.

38. CS Policy CSD2 sets out the District’s Residential Needs and meets the specific requirements of vulnerable or excluded groups within the district. Residential accommodation providing an element of care is supported by CS Policy CSD2 providing it is designed to provide a high quality of care, it does not lead to an over-concentration of socially vulnerable people in a neighbourhood and it makes a suitable contribution as necessary to the community and sustainable transport infrastructure needs associated with residents. All of the policy criteria contained in Policy HB12 are consistent with CS Policy CSD2, whilst criterion HB12 (3) expands further to ensure the residential amenity of residents is protected in accordance with paragraph 123 of the NPPF.

39. The council considers it necessary and reasonable to maintain the existing stock of residential care homes and institutions in the district in order to meet the increased need
in the district over this plan period, as outlined in supporting paragraph 9.83. Policy HB11 aims to avoid the loss of residential care homes and institutions by ensuring through criterion HB11 (1) that clear evidence is provided in the form of a viability report to demonstrate that the current building is either not economically sustainable, extension or adaptation is not viable; and the use is no longer viable and the business has been actively marketed for a minimum of 12 months.

40. The council considers that the policy, as a whole, provides sufficient flexibility and the requirement for a 12 month marketing period is a widely-applied timeframe and is not overly restrictive and enables seasonal variances to be taken into account.

Policy HB13: Houses in Multiple Occupation (HMOs)

41. Paragraph 17 of the NPPF (2012) sets out 12 principles for Sustainable Development that planning should consider. One of these principles is that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. Policy HB13 seeks to ensure that this applies to larger Houses in Multiple Occupation (HMOs) for more than six people, and the main issue this policy addresses focuses on preventing the cumulative harm to an area that may be caused by multiple concentrated HMOs, which is particularly pertinent in older parts of Folkestone which are characterised by large Victorian properties capable of housing six or more people.

42. Supporting paragraphs 9.87–9.90 in the PPLP identify the main issues caused by poorly managed HMOs. Parking provision is one of a number of issues identified in the Government’s 2008 review of housing in multiple occupation (DCLG, 2008), and a planning balance will be struck on a case-by-case basis. Parking is therefore a particular aspect that the policy specifically aims to address, together with storage provision for refuse, which is also recognised as a specific issue resulting from HMOs. The aims of Policy HB13 are supported by the council’s Licensing team, which operates under the powers of the Housing Act to require HMOs to present a detailed management plan to ensure it meets a prescribed amenity standard, is managed by a fit and proper person and that there are suitable management arrangements in place.
Policy HB14: Accommodation for Gypsies and Travellers

43. CS Policy CSD2: District Residential Needs aims to meet the specific requirements of vulnerable or excluded groups within the district, and states that a policy will be included in the Local Plan to provide criteria for Traveller sites in line with national policy. PPLP Policy HB14: Accommodation for Gypsies and Travellers sets out general criteria for assessing sites for travellers that come through the planning application process, in accordance with Planning Policy for Traveller Sites (PPTS) (2015). The issue of provision for Gypsies, Travellers and Travelling Showpeople is considered further in the council’s response to Main Matter 2.

44. Paragraph 13 of the PPTS (2015) states that local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Accordingly, policy criterion HB14 (2) requires that the site is in a sustainable location, well-related to a settlement with a range of services and facilities and is, or can be made, safely accessible on foot, by cycle or public transport.

45. On the whole, the policy criteria set out in Policy HB14 (1–6) are considered to be in accordance with paragraphs 4 and 11 of the PPTS, which advises that criteria-based policies should be fair, realistic and inclusive, and should facilitate the traditional and nomadic life of travellers, while respecting the interests of the settled community.

Sustainability Appraisal (SA)

46. Policies HB1–HB14 have been subject to Sustainability Appraisal (SA) in accordance with national guidance and the regulations set out in paragraph 3.42 of the PPLP.

47. Sustainability Appraisal Report – Reg. 19 Submission Draft (Doc 2.6), Section 8 appraised the development management policies using a ‘policy-on’ approach including mitigation and enhancement measures to assess the overall effects of development against each SA objective. Overall, the SA found that all new housing will be delivered in accordance with the Local Plan H&BE Policies relating to high quality design and construction, so it is assumed that the new housing will be high quality.
Does the local plan make sufficient provision for inclusive design and accessible environments in accordance with paragraphs 57, 58, 61 and 69 of NPPF?

48. Promoting and delivering development which is of high quality and inclusive design is a key priority for the council. Local planning authorities are required by the NPPF (2012) to develop robust policies that help to create safe and accessible environments (paragraph 58). They should also encourage high quality and inclusive design (paragraph 57) and use evidence to plan to meet the needs for housing for different groups (paragraph 50). Expanding further, CS Policy CSD2: District Residential Needs requires all developments of 10 dwellings or more (Class C3) to include 20 per cent of market dwellings which meet the Lifetime Homes standards, unless demonstrated to be unfeasible in design or viability terms.

49. Given the demise of the Lifetime Homes standards, Code for Sustainable Homes and Secured by Design in 2015, the PPLP requires all developments of 10 dwellings or more to include a minimum of 20 per cent of market dwellings meeting M4(2) Category 2 (Accessible and Adaptable Dwellings), which can include units of M4(3) Category 3 (Wheelchair User Dwellings) if desired or as part of affordable or extra-care housing requirements in order to make sufficient provision for high quality and inclusive design, in accordance with paragraph 57 of the NPPF (2012). This is clearly outlined within Policy HB3 itself, and is supported by more detailed explanation in preceding paragraphs 9.25–9.27.

50. The creation of accessible environments to ensure crime and disorder, or the fear of crime, do not undermine quality of life of community cohesion as required by paragraphs 58 and 69 of the NPPF, is partially covered by Policy T1 (5), which makes reference to supporting the development of active frontages for the purposes of natural surveillance and creating characterful places. The important correlation between good design reducing both the perception and risk of crime is specifically covered in supporting text in paragraph 9.6 of the PPLP in support of Policy HB1, which encourages quality places through design. This policy also requires development to make a positive contribution to its location and surroundings by enhancing integration and a mix of uses to create places of character, together with active forms of travel to be prioritised with roads, footways and paths appropriately located to allow for natural surveillance, and to provide a clear definition between public and private spaces including landscaping, boundary treatments, public open spaces and lighting.
51. In addition, policy criterion HB1 (2) relating to legibility and ease of movement, and policy criterion HB1 (5) relating to the quality of and management of public spaces, assist with the accessibility function of places as they promote designs where users of the space can move easily and safely through developments, understand their location, and include appropriate street lighting and furniture and natural surveillance, which will encourage regular use. This is further supported in policy criteria HB2 (8) and (11) which encourage legibility and well-managed, safe public spaces. Moreover, within town, district and local centres, Policies RL1–RL7 all encourage active frontages at street level, together with residential development on upper floors to enhance the vitality and viability of town centres. All criteria of Policies HB1 and HB2, applied together, will reduce the opportunity for crime and the fear of crime within new developments in accordance with paragraphs 58, 61 and 69 of the NPPF (2012).

52. As stated within paragraph 61 of the NPPF, securing high quality and inclusive design goes beyond aesthetic considerations, and includes addressing the connections between people and places and the integration of new development into the natural, built and historic environment. Policies HB1 and HB2 contain a number of criteria in which inclusive design, in all of these aspects, is promoted. Policy HB3 adds more detail in regards to space and accessibility standards within individual dwellings and their private external spaces. This policy promotes internal space standards which ensure new homes have sufficient space for the number of occupants, including wheelchair users, appropriate storage areas and useable private external amenity spaces, in accordance with paragraphs 57 and 61 of the NPPF.

53. Policy criterion HB1 (6) also requires development proposals to show how they have responded to other relevant policies within the development plan and responds positively to local design policies and guidance, including relevant Town and Village Design Statements and Neighbourhood Plans. Paragraph 129 of the NPPF (2012) ensures that local planning authorities have access to, and make appropriate use of, tools and processes for assessing and improving the design of development, including assessment frameworks such as Building for Life (BfL). The council has used the BfL criteria to inform Policy HB2: Cohesive Design. The council considers that these tools and guidance available, in addition to the range of specific criteria within Policies HB1 and HB2, more than adequately deal with the issues of inclusive design and accessible
environments and will ensure high quality design remains a key aspect of all new development in the district, in accordance with paragraphs 57, 58, 61 and 69 of NPPF.
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