

Forward & Area Planning
Howden House
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Sheffield
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SENT BY EMAIL
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12/10/2020

Dear Sir / Madam,

SHEFFIELD PLAN: ISSUES AND OPTIONS 2020

Thank you for consulting with the Home Builders Federation on the Sheffield Plan Issues and Options consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

We would like to submit the following comments upon the proposed options for the Local Plan. These responses are provided in order to assist the Council in the preparation of the emerging local plan. The HBF is keen to ensure that the Council produces a sound local plan which provides for the housing needs of the area.

Consultation questions

Q5: Do you agree that the annual housing requirement figure in the Sheffield Plan should be the same as the housing need figure calculated by the Government? Please explain your answer.

The consultation document states that over the next 18 years Sheffield needs nearly 40,000 new homes, at an average of about 2,185 homes per year, to meet the needs of our growing population and to replace homes that are demolished or lost to other uses. It goes on to suggest that the Council consider it is possible to deliver around 30,000 new homes in the existing urban area, with the remainder of the land for housing requiring Green Belt release, or higher density development.

The latest LHN calculated using the standard method is 2,131dpa, the full calculation can be found in Appendix 1. It should be noted that the local housing need figures calculated by the standard method are the minimum starting point in determining the number of homes needed in the area. Circumstances where housing need may be higher, include where there are growth strategies; strategic infrastructure improvements; meeting an unmet need; where previous levels of housing delivery

are higher; or previous assessments of need, which in the case of Sheffield would be likely to require a higher figure than the LHN indicated by the standard method.

The Housing Technical Note highlights the Government 'Changes to the Current Planning System' consultation and states that the Council will amend the housing need figure to reflect any changes to the method that are confirmed prior to the publication draft. The HBF considers that it is important that the Council ensure there is sufficient flexibility within the Plan to ensure that it is capable of coping with these changes. The HBF also considers that the Council should note that the consultation continues to state that the proposed method will provide the starting point and not the final housing requirement, and therefore the above considerations are likely to continue to apply.

Q6: How should the Sheffield Plan respond to the housing needs of specific groups? (Examples include people on low incomes, first time buyers, older people, self-builders and people with mobility problems)

The consultation document identifies a need for around 900 new affordable homes each year and proposes that 30% of homes in the highest value areas and 10% of homes in the rest of the city should be affordable.

The HBF considers that the Council should ensure that they have the appropriate evidence to support this affordable housing need and to ensure that the proposed requirements are viable and will not limit the delivery of homes. The Council may also want to consider whether it is appropriate to increase the housing requirement to ensure that sufficient affordable homes are provided across the city.

The consultation document also highlights the need to address the ageing population and proposes that all new homes should be easily adapted to cater for elderly residents and that 10% of all new homes are suitable or can be adapted for wheelchair users. The HBF has considered evidence provided by the ONS¹ which suggests that around 18.3% of the UK population were aged 65 years or over in 2018, increasing to 24.2% by 2038. This compares with 16.1% in Sheffield in 2018 and 19.7% by 2038. This shows that there are significantly less people aged over 65 years in Sheffield than the UK average and that the UK population is also ageing faster than can be seen in Sheffield. However, the HBF generally supports the Council in seeking to address the needs of the ageing population. The HBF consider that the Council need to ensure that they have considered all of the possible housing requirements for older people, PPG provides guidance on how this could be done. The PPG also highlights the different types of housing that can be provided to meet the diverse needs of older people including age restricted market housing, retirement living, extra-care housing and residential care homes, the Council should consider the needs for all types of homes. The Council should also ensure that they have the evidence to support the requirements for all new homes to be easily adaptable and for 10% of homes to be suitable or adaptable for wheelchair users, PPG sets out the evidence needed to introduce the optional standards in relation to the M4(2) and M4(3) standards.

¹ ONS Overview of the UK Population: August 2019
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/overviewoftheukpopulation/august2019>

Q7: Should the Sheffield Plan adopt the Government's minimum space standards for new homes? Please explain your answer.

The NPPF² says that local planning authorities should identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand. The PPG³ identifies the evidence that the Council should consider in determining whether there is need for the NDSS to be introduced these include need, viability and timing. The HBF considers that the Council will need to gather the appropriate evidence and determine whether the standard is appropriate for their area, and whether it needs to be provided on every home.

The HBF notes that in order to provide a range and choice of homes some developers will provide entry level two, three and four bedroom properties which may not meet the optional nationally described space standards but that do help to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The industry knows its customers they would not sell homes below the enhanced standard size if they did not appeal to the market. It needs to be recognised that customers have different budgets and aspirations, and generally that is based on the number of bedrooms provided not the floorspace of the building. The HBF is concerned that the requirements of this policy may reduce choice and affordability and could in turn impact on delivery of homes. There is no evidence that the properties have not sold, or that those living within these properties consider that they do not meet their needs. There is no evidence provided that the size of the homes being completed are considered inappropriate by those purchasing them or that these homes are struggling to be sold in comparison to homes that do meet the standards.

The HBF in partnership with NHBC undertake a Customer Satisfaction Survey⁴, the 2018/19 asked how satisfied or dissatisfied the buyer was with the internal design and layout of their new home, 93% of those who responded were either fairly satisfied (28%) or very satisfied (65%). This does not appear to suggest there are significant number of new home buyers looking for different layouts or home sizes to that currently being provided.

Q8: Should all new homes be designed to be adaptable for lifetime use at minimal cost? Please explain your answer.

The HBF generally supports the use of 'Building for a Healthy Life'⁵, this is a Design Code to help people improve the design of new and growing neighbourhoods. The guidance covers the priorities for creating healthier communities, including improved walking, cycling and public transport links, with reduced carbon emissions and better air quality.

The HBF notes that all new homes will be built to Part M4(1) of the Building Regulations. According to the regulations meeting part M4(1) will ensure reasonable provision for most people, including wheelchair users, to approach and enter the

² Paragraph 61 of NPPF 2019

³ PPG (ID:56-020)

⁴ <https://www.hbf.co.uk/policy/policy-and-wider-work-program/customer-satisfaction-survey/latest-results/>

⁵ <https://www.designforhomes.org/project/building-for-life/>

dwelling and to access habitable rooms and sanitary facilities on the entrance storey, and as such these standards are likely to be suitable for the majority of people. The HBF have set out the evidence that would be required to provide any additional optional standards above this level in response to question 6.

Q21: How should the requirements relating to the design of new developments be changed to respond to future challenges such as climate change or pandemics?

The HBF considers that the new Plan should not require new homes to be built to a standard in excess of statutory Building Regulations. Today's new homes are very energy efficient with lower heating bills for residents compared to existing older homes. The HBF supports moving towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements, which is universally understood and technically implementable. This is considered to be in line with what the Government is seeking to achieve through its Future Homes Standard.

The HBF considers that the Council should work closely with the home building industry to determine where there are changing demands from new homes due to Covid-19, and whether this is likely to be ongoing need or not. This could for example include new approaches to living and working to allow for more people to continue to work from home.

Q22: Which of the 3 spatial options (A, B, C) do you prefer? Please explain your answer.

- *Option A seeks to provide high density developments, with 20,000 homes in the New Central Area and 20,000 in the New Urban Area.*
- *Option B seeks to provide mid-rise development in the central area and new homes with private gardens in the suburbs, with 15,000 homes in the New Central Area, 20,000 homes in the New Urban Area and 5,000 homes on land released from the Green Belt.*
- *Option C seeks to provide a less dense central area with more new homes with private gardens in the suburbs, with 10,000 homes in the New Central Area, 20,000 in the New Urban Area and 10,000 homes on land released from the Green Belt.*

The HBF considers that the Council will need to ensure that whichever option is chosen provides sufficient deliverable and developable sites to meet the housing need throughout the plan period. The sites should also provide a range of development opportunities in terms of size and location to maximise delivery from the whole of the home-building industry.

Q25a: Do you agree with the criteria for selecting sites set out in the box on page 52? Q25b: Are there any other criteria which we should take into account?

The HBF considers that the criteria set out on page 52 are generally appropriate considerations when looking to allocate land for development.

Q26: If it is necessary to remove some land from the Green Belt to meet future development needs, which would be the best general locations?

The HBF considers that the Council should give consideration to need, sustainability of locations, land availability and green belt function when seeking to remove land from the Green Belt.

Future Engagement

I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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Appendix 1: Standard Methodology for calculating the Local Housing Need

Using the standard method and the latest figures the local housing need can be calculated as follows:

- Step 1 – Setting the baseline
Using the 2014-based household projections to calculate the average annual household growth over the 10-year period from 2020 to 2030, which is **1,932 dwellings**⁶.
- Step 2 – An adjustment to take account of affordability
Adjust the average annual household growth figure based on the affordability of the area, using the following formula

$$\text{Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

$$\text{Adjustment factor} = ((5.65 - 4 / 4) \times 0.25) + 1 = \mathbf{1.103125}$$

$$\mathbf{\text{Local housing need} = 2,131^7.}$$

- Step 3 – Capping the level of any increase
A cap can be applied which limits the increases a local authority can face. Where the relevant strategic policies for housing were adopted more than 5 years ago (as is the case for Sheffield), the local housing need figure is capped at 40% above whichever is the higher of:
 - a. The projected household growth for the area over the 10-year period (2,705⁸); or
 - b. The average annual housing requirement figure set out in the most recently adopted strategic policies (1,995⁹).

The latest LHN is below both the potential caps, and therefore remains at **2,131 dwellings**.

⁶ 2020 – 247,611, 2030 – 266,931, Change – 19,320

⁷ 1,932 x 1.103125 = 2,131.2375

⁸ 1,932+(1,932x0.4) = 2,704.8

⁹ 1,425+(1,425x0.4) = 1,995