

Sent by email to: Local.Plan@basingstoke.gov.uk

08/11/2020

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the Basingstoke and Deane Local Plan Update

1. Thank you for consulting the Home Builders Federation (HBF) on the Issues and Options consultation. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Tackling the climate emergency

Q5(a) Which option is the most suitable energy standard for new homes and non-residential buildings? Should all types and scales of development be required to meet these standards?

2. The housebuilding industry, through the HBF, recognises that there is a need to move towards stronger measures to improve the environmental performance of new residential development. This is in terms of reducing carbon emissions in new homes, providing gains in biodiversity on all developments, green infrastructure and improving the environment around new developments.
3. However, the HBF, and our members, consider a national and standardised approach to improving such issues as the energy efficiency of buildings, the provision of renewable energy and the delivery of electric vehicle charging points to be the most effective approach that balances improvements with continued deliver of housing and infrastructure. It is the industry's preference for a national approach to improving the environmental performance of residential developments, rather than local authorities setting their own standards. We consider this is necessary to allow research and development and supply chains to focus upon responding to agreed national targets, and for training providers to plan their programmes to equip the labour force to meet these new requirements. It is fundamentally inefficient to create a plurality of standards.



4. In seeking achieve a more standardised approach the Government consultation “Future Homes Standards” outlines the options for improving technical standards with regard to energy efficiency in residential buildings. The options proposed in the short term are a 20% or 31% reduction in carbon emissions compared to current part L of the 2013 Building Regulations. Whilst the Government favours a 31% reduction there will be difficulties in achieving this higher standard in the short term given the immaturity of the supply chain for the production and installation of heat pumps, and the additional load that would be placed on local electricity networks when coupled with Government proposals for the installation of electric vehicle charging points in new homes. For this reason, the HBF’s response to Government recommends that the 20% improvement be the first step moving to the higher 31% improvement in 2023.
5. Therefore, when considering their approach to such matters the councils should ensure that they are working within the policy and legislative framework in place at the point of adoption. Based on the Future Homes Standards as published this is likely to see technical standards set through Building Regulations and not planning policy which would make option 3 the only sound approach. However, without the Government’s definitive position it is impossible to state at present what approach would be sound.
6. Should the policy framework remain unchanged by the point of adoption the Councils must take account of current guidance which sets out the approach that Councils should take with regard to technical standards relating to energy efficiency with paragraph 50 of the NPPF stating that:

“Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.”
7. The Planning Practice Guidance (PPG) expands on this provision outlining that policies requiring higher energy performance standards than building regulations should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes. This standard would achieve 20% reduction in CO₂ compared to 2013 building regulations and as such option 2 would be considered a sound approach. At this point in time option 1 requiring all new development to reach net zero carbon is not consistent with national policy. In addition, there would be a significant risk that such a requirement would make development unviable and render the local plan undeliverable. Evidence from the Centre for Sustainable Energy¹ indicates that the cost of achieving zero carbon in reduction to be around a 10% increase in the capital cost of delivering each new home. However, given the limitations in supply chains at present this could be much higher. Whilst we agree it is important to improve the energy efficiency of new homes this must be

¹ <https://www.cse.org.uk/downloads/file/cost-of-carbon-reduction-in-new-buildings.pdf> n

done in a manner that ensures the continued delivery of new market and affordable homes.

Q5(b) Should the council require a minimum proportion of carbon to be reduced by: improvements to the building's fabric, and/or on-site renewable or low carbon energy?

8. No. Any reductions in CO₂ compared to Part L of the Building Regulations should be for the developer to determine how this is achieved on the basis of the site and the type and mix of properties being delivered.

Q5(c) Are there any other options we should be considering?

9. No.

Q5(k) Should the Local Plan Update encourage or require large scale developments to connect to a district heat network where opportunities to do so have been identified?

10. The Government is committed to achieving net-zero greenhouse gas emissions by 2050. At present the heating of buildings is responsible for a third of the UK's greenhouse gas emissions. To meet the Government's legal commitment virtually all heating within buildings will need to be achieved from carbon neutral sources. Heat networks are one aspect of the path towards this goal, however the predominant technology currently used for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies
11. The Council should also consider the Department for Business, Energy and Industrial Strategy consultation on Heat Networks: Building A Market Framework which closed on the on 1st June 2020. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity, or water. Some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. These concerns should be considered by the Council.

Creating beautiful places and high-quality living environments – a focus on place shaping

Q6(c) Do you have any views on how these design priorities should be achieved? and Q6(d) Should the Local Plan Update be more visual and include examples of the type of designs supported?

12. In order to achieve its design priorities for an area, it will be essential that the Council works with developers rather than imposes specific examples as to what it considers to be good design. The development industry understands its consumers and what they are looking for within a new home and as such any consideration as to design of a development should have significant flexibility. As such the HBF generally supports the use of 'Building for a Healthy Life'², 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. Using more general policies and broad principles that guide an applicant as to the what the Council are seeking to achieve with regard to design without being overly prescriptive offers the opportunity to create a variety of well-designed communities. Over prescription and providing visual examples within the local plan itself runs the risk of reducing the variety of development and consumer choice. The most effective way of delivering a variety of visually different high-quality developments is by providing a wide range of sites, of all sizes, in a variety of locations. This will encourage a diversity of opportunities for different developers which in turn will ensure a variety of development type and style.

Q6(g) Do you agree that the NDSS should be included as a policy requirement in the Local Plan Update? If not, why is this?

13. The Council will need to provide the necessary evidence to support the introduction of space standards as set out in Planning Practice Guidance. Whilst we recognise the need for homes to be built to high standards it is important to recognise that there can be some negative impacts with regard to consumer choice for those seeking more affordable market housing from imposing rigid space standards. For example, some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but which would allow households on lower incomes to afford a property which has their required number of bedrooms. Space standards may lead to such households being prevented from buying a home that meets their needs in terms of rooms. If the Council considers it necessary to adopt space standards and has the evidence to support this approach we would therefore suggest that some flexibility is provided within the policy to allow the delivery of well-designed homes below space standards that meet an identified need.

² <https://www.designforhomes.org/project/building-for-life/>

Q6(h) Do you have any views on the size of new homes which have been built in the borough in order to inform the evidence base relating to this issue?

14. The HBF in partnership with National House Building Council (NHBC) undertake an annual independently verified National New Homes Customer Satisfaction Survey. The 2019 Survey demonstrates that 91% of new home buyers would purchase a new build home again and 89% would recommend their housebuilder to a friend. The results also conclude that 93% of respondents were happy with the internal design of their new home, which does not suggest that significant numbers of new home buyers are looking for different layouts or house sizes to that currently built.

Developing a Spatial Strategy

Q7(a) Do you agree with the key elements of the spatial strategy listed in paragraph 7.2.1?

15. We would support the broad approach to the spatial strategy outlined in 7.2.1. However, with regard to the second bullet point we would suggest that the need to respect the pattern of settlements across the Borough whilst meeting development needs could restrict the Council from delivering sustainable sites. We can broadly understand why the Council may want to prevent settlements from coalescing however the Council must not look to set the existing pattern and hierarchy of settlements in aspic. Such an approach potentially ignores the possibility of settlements from expanding and 'moving up' the settlement hierarchy should there be development opportunities that support such a change. It must also be recognised that the changing ways in which many people live will mean that traditional settlement hierarchies which are focussed on access to services may well need to be revisited as the plan is prepared.

Q7(b) Are there other considerations that need to be taken into account in developing the spatial strategy?

16. See above.

Q7(c) Should land in employment and retail use be considered for new homes where it is vacant or underused? If yes, which locations should be considered?

17. Yes. Where there is no longer a need for a particular land use then it is imperative that the Council considers how it could be used in future. There is no justification for seeking to maintain a particular use should there be limited likelihood that it will be used for that purpose. Indeed paragraph 120 in the National Planning Policy Framework is clear that policies and decision need to reflect changes in the demand for land.

7(e) Would you support the principle of high-density development in suitable locations in the borough? If yes, in what locations?

18. Where appropriate high-density development should be supported by the Council. The Government has through the NPPF looked to encourage local planning authorities to ensure that the most efficient use is made of land higher-density development should be supported where appropriate. However, it will be necessary for the Council to consider the variety of other factors, as set out in paragraph 122 of the NPPF, such as identified needs, local market conditions, viability and character when considering where higher density development might be appropriate. So, whilst it is important to maximise development on suitable sites the Council must avoid seeing higher densities across urban areas as the solution to meeting housing needs.

Q7(g) Would you support the introduction of minimum density standards to uplift the density of residential developments? Please explain your answer.

19. The HBF does not support the use of minimum density standards given that the NPPF requires Councils to achieve appropriate densities. This is a flexible approach that recognises that different circumstances facing the developer of each particular site. Rather than setting minimum densities we would suggest that the Council work with those proposing sites for allocation in the plan to agree appropriate densities that take account of those circumstances set out in paragraph 122 of the NPPF. Such an approach will also enable the Council to better understand what is actually deliverable on each site and the amount of land required to meet its development needs.

Q7(h) Which option or combination of options would you support for greenfield development? Please explain your answer.

20. Largely, the decision as to where to build will depend on many factors ranging from the availability of developable sites through to the location of infrastructure both now and in the future. The HBF cannot comment on or promote specific locations for development but in our experience the most effective approach to delivering the levels of housing building required is to ensure a wide variety of sites are allocated both in terms of size and location. The Council's should look to identify sites that will support all sectors of the house building industry and as such ensure consistent delivery across the plan period by avoiding an over concentration of development in a specific area or an over reliance on large strategic sites.
21. As such we would not support either options 2 or 5 which place too great an emphasis on development in one location. Neither of these options would, on their own, provide the breadth of location or site that would deliver a variety of sites that can maintain supply across the plan period and provide a variety of choice for consumers. Instead we would recommend that the Council considers a combination of options. This would allow the Council to consider wider variety of sites and in particular identify more smaller sites that will come forward more quickly to ensure that needs are met early in the plan period and not pushed back

as would be the case if reliance was placed solely on delivery through large strategic sites or new settlements.

Q7(j) Do you support the approach of grouping settlements by size, role and provision of services and facilities to inform decision-making for where future development should be located?

22. Whilst it is important to understand the level of services in each settlement this should not necessarily define whether or not development should be located in a particular settlement. As outlined above the Council should not rule out the possibility that a settlement could move up the hierarchy as a result of a proposed allocation providing additional services. Such proposals potentially improve the sustainability of a settlement and deliver wider benefits to that settlement and its population and must be a key consideration of the Council development strategy. In addition, the Council should also consider whether further development could increase demand for existing services in a settlement securing them for the whole community in the long-term.

Q7(n) Do you agree that the factors listed above should be considered when determining suitable levels of growth in settlements?

23. See response to question 7j.

Q7(p) Which option or options would you support?

24. As set out in our response to question 7h it is important to ensure the Council allocates a range of different sites both in terms of location and size. It is only through having a variety of sites coming forward that will ensure the plan delivers consistently in both the early years of the plan and in the long term. It is important for the Council to recognise that focussing on a few large sites will potentially reduce choice and place the plan at greater risk of not meeting needs should these sites fail to come forward as expected.

Protecting and enhancing our natural and historic environment

Q9(f) Should the Local Plan Update require more than 10% biodiversity net gain?

25. No. The HBF recognises the importance of new development supporting improvements in biodiversity and the decision to place legislative requirements on new development with regard to delivering net gains to biodiversity. Whilst we have raised concerns with the Government regarding the level at which net gains might be set, we consider it essential that the percentage required in legislation is not varied by local authorities. As the Council will be aware the additional cost of any net gain proposed by Government is expected to come off the land value. A consistently applied national policy will help with this regard with all parties fully aware of the legislative requirements. The Council must bear in mind that any

move away from this requirement will have an impact on the viability of development as land values will be based on what is required by legislation.

26. The Government have also stated that 10% achieves a level of improvement which the Government consider to strike "*the right balance between ambition, certainty in achieving environmental outcomes, and deliverability and costs for developers*". If the Government are confident that a 10% requirement will deliver genuine net gain, offset the impacts of development, and ensure homes continue to come forward the Council should not seek to require additional improvements beyond what is set out in legislation.
27. Therefore, in order to ensure this nationally consistent approach is effective it is essential that individual councils do not seek to move away from any required standards. To require a higher percentage than that established by legislation would be inconsistent with the approach presented by the Government on biodiversity net gain and threaten the deliverability of development in Basingstoke and Deane.

Meeting the housing needs of all

Q10(e) Which option would you support for homes for older people and those with support needs?

28. The Council will be aware of the recently published consultations with regard to Part M of the building regulations and as such any comments made here are related solely to current policy. As such in considering these options the Council will need to have regard to footnote 46 in paragraph 147 in the NPPF which states that policies on adaptable and accessible housing should be used "... *where this would address an identified need ...*". This would suggest that any policy should seek to address an identified need that is required rather than considering these standards as being 'nice to have' on all new homes.
29. The consultation document outlines that there is a growing number of people over the age of 75 within Basingstoke and Deane. However, this in itself does not indicate that all homes need to be built to the higher accessibility standards as is being proposed in option 1. We would not dispute that across the UK there is an ageing population, however the HBF does not agree that this leads to the conclusion that all new homes should be built to part M4(2).
30. Firstly, the need for more accessible homes above current standards must take account of those older people who live in a recently constructed house. All new homes will be built to part M4(1) which, according to Part M of the Building Regulations, will ensure reasonable provision for most people, including wheelchair users, to approach and enter the dwelling and to access habitable rooms and sanitary facilities on the entrance storey. As such these standards are likely to be suitable for the significant majority of people as they get older and including many those with long term health problems or disabilities.

31. Secondly, many people with a long-term health problem or disability will be able to adapt their current home to meet their needs. Given that many of those who will need to adapt their homes in future will already live in the Borough this will reduce the number of people moving to meet their housing needs. Some evidence related to this is provided in the English Homes Survey. Whilst we recognise that this is a national study it provides an indication as to the proportion of more adaptable homes that are required. The study examined the need for adaptations in 2014/15³ and noted that just 9% of all households in England had one or more people with a long-term limiting illness or disability that required adaptations to their home and that this had not changed since 2011-12. So, despite an increasing proportion of older people in the general populace the proportion of the population requiring adaptations had not changed. The survey also found that in 2014-15, 81% of households that required adaptations in their home, due to their long-term limiting disability, felt their current home was suitable for their needs and that 10% of those households whose home required an adaptation were trying to move somewhere more suitable.
32. So, whilst there is an ageing population this does not directly lead to the need for all new homes built to higher accessibility standards. An ageing population will lead to more people who are likely to have a mobility problem but not necessarily more people who need a new more home built to the M4(2). Many older people, and indeed those of all ages with a long-term limiting illness or disability, will be able to adapt their existing homes to meet their needs and do not need to find alternative accommodation. As such we would suggest that, on the basis of the current approach set out in the NPPF and PPG, option 2 is more appropriate.

Q10(g) Which option (or combination of options) would you support for specialist accommodation?

33. In seeking to meet the needs of older people we would recommend that the Council first looks to establish the need for such accommodation as recommended in paragraph 63-001 of PPG which states:

“... an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.”

34. From this understanding the Council can then seek to plan proactively for these needs through the allocation of sites to provide for the accommodation needs of older people. At present the Council’s approach, as set out in option 1, is reactive and based on delivery through windfall development. We would suggest that the Council take a more proactive approach and seek to engage with developers of specialist accommodation in order to identify sites that are close to services and

³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/539541/Adaptations_and_Accessibility_Report.pdf

which will meet the needs of older people as set out in option 3. In addition, we would suggest that the Council include in a policy the number of specialist units it is seeking to provide each year in order to monitor whether or not it is meeting the needs of older people. This policy should also establish a presumption in favour of development proposing older people's accommodation where delivery has fallen below what is needed annually.

Q10(j) Which option would you support for the size and mix of market housing?

35. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is effective and ensures that housing delivery will not be compromised or stalled due to policies that are prescriptive in applying evidence for a Borough wide mix of housing on every site. It is important to remember that whilst Strategic Housing Market Assessments (SHMA) can provide a broad snapshot in time of what is needed across an LPA or HMA they do not provide a definitive picture as to the demand for different types of homes in specific locations.
36. So, whilst we support Council in seeking to achieve a broad mix across the plan period this should not be translated directly into policy setting out a specific mix. It should be left for developers to supply the homes they consider are necessary to meet demand. We would therefore support option 3.

Q10(n) Which option would you support for how the council should meet its future requirement for self-build plots?

37. The Council should consider how it can encourage more landowners to bring forward sites for self-build that would provide homes in addition to those provided by housebuilders both large and small. At present the Council's approach merely changes the delivery mechanism for a particular unit and in many cases will slow delivery of those units. The Council should also consider paragraph 57-024 of the PPG which sets out a variety of approaches that need to be considered – including the use of their own land. This is reiterated in para 57-14 of the PPG which sets out the need for Council's to consider how they can support the delivery of self-build plots through their housing strategy, land disposal and regeneration functions. It is important that the Council can show how it has considered each of these mechanisms as part of the local plan review. In line with guidance in PPG the Council will also need to review its evidence base to ensure that those on the register have the means to purchase and build their own home and that there is no double counting with other registers in neighbouring authorities.

Conclusion

38. We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt'.

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