

Sent by email to: planning.policy@westsuffolk.gov.uk

22/12/2020

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the West Suffolk Local Plan

Thank you for consulting the Home Builders Federation (HBF) on the West Suffolk Local Plan (WSLP). 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.

The consultation on the WSLP sets out a broad framework for growth and provides little in the way of detail on which to respond. As such we have provided some general comments on those issues relating to housing needs and supply that we believe will help the Council prepare a sound plan.

Part 1 Developing a spatial strategy

Strategic Issue 2: The right homes for our communities

The Councils correctly recognise that housing is one of the most important issues in planning and one that must extend beyond considerations of meeting the minimum needs as calculated using the standard method. Using the Government's approach results in a local housing needs assessment of circa 800 dwellings per annum (dpa). However, it is important to recognise that the Government state in PPG that this is the minimum number of homes that must be planned for and that it does not attempt to predict the impact of other factors. Therefore, in an area with strong economic growth, and aspirations to maintain this growth, as well as the affordability of housing remaining high with lower quartile prices nearly 10 times lower quartile incomes, it will be important for the Council to establish a housing requirement in the WSLP that seeks to address both these concerns. As the Council also recognise the minimum number of homes it must plan for may change as a result of the amendments being proposed by Government to the standard method.

The Council note that other authorities have also looked to deliver more homes than is required in order to provide flexibility into their supply to ensure needs are met in full. We would agree that such an approach is necessary and accords with paragraph 11



of the NPPF. This paragraph requires local plans to be sufficiently flexible to adapt to rapid change. It is therefore important that the supply of land ensures that should some sites not deliver as expected then there must be sufficient capacity to ensure needs are met in full. It stands to reason that in order for a minimum number of homes to be delivered then the Council needs to allocate land to deliver beyond its minimum requirement. To ensure sufficient flexibility to take account of any changes that may occur during the plan period we would recommend a 20% buffer in supply over the stated requirement.

Local Plan Options

This section of the consultation document considers the broad options for the distribution of growth with West Suffolk. We would not consider there necessarily be one particular option that will on its own deliver what is need in West Suffolk. 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 development required in West Suffolk is to ensure a wide variety of sites are allocated both in terms of size and location.

In a similar vein it is essential that the Council is consistent with paragraph 68 of the NPPF and ensure 10% of all homes are delivered on sites of less than 1 hectare. HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure with a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or else the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have. This is why the Government, through the NPPF, now requires local authorities to allocate more sites of varying sizes.

The Council's should look to identify sites that will 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. By ensuring delivery on a variety of sites the Council will improve the strength of the housing market by encouraging a range of housebuilders to operate in the Borough who in turn will provide a variety of different housing types and styles.

Therefore, whilst the consultation document sets out a range of possible development scenarios for West Suffolk, we would urge the Councils not to fall on a single strategy at this early stage of plan preparation. It is more likely that the spatial strategy will include elements from the potential options set out in the consultation document.

Part 2 Local Issues

Housing

The kind of housing that is required in West Suffolk will need to be based on the evidence of needs as set out in the Strategic Housing Market Assessment (SHMA) that is currently being prepared. However, we would suggest that with regard to the type of market housing that is provided the Council should not seek to place overly restrictive policies that seek to set the precise mix of housing provided on all sites. SHMAs can only provide a snapshot in time and can only be considered as providing a guide as to the type of housing that should be delivered in future rather than a requirement. Delivering a mix of homes requires the provision of a range of site typologies and locations that will allow for a diversity of market provision. In relation to specific types of need we would make the following comments:

- ***Affordable housing:*** It will be important for the Councils to ensure that their viability assessment reflects the latest policy and guidance published by the Government. The focus on viability assessment and how it relates to affordable housing places a far greater emphasis on viability being assessed as part of the local plan and that compliance with policy requirements should be set so that most sites are deliverable without further viability assessment negotiations. This may require the Councils to include greater variation in affordable housing requirements based on site type and location to reduce the need for negotiation in relation to onsite affordable housing provision. To aid Councils in the preparation of their viability evidence the HBF has worked with its members to provide a briefing note (attached) to aid understanding of the housebuilding industries approach to viability.
- ***Older people's housing:*** It will be important for the Council to identify and allocate sites to meet the specific needs of older people. Too often such development is expected to come through windfall or on strategic allocations with no specific target set in the local plan as to how many specialist homes for older people should be provided. This approach does not offer the necessary certainty that needs will be met. As such we would suggest the local plan undertakes to, firstly, establish a housing requirement specifically for the needs of older people. This will ensure that the supply of such homes can be effectively monitored and any under supply be taken into account when making decision on applications for older peoples' accommodation. Secondly, we would suggest that the Council's work with specialist providers to identify suitable sites that will meet the specific needs of older people. Such accommodation needs to be in sustainable locations close to services and as such it is important to work closely with this sector of the housebuilding industry to understand the needs of their customers.
- ***Self-build:*** We are supportive of self-build and custom house building and the important contribution such development can make to housing supply. However, we are concerned that the need for such homes can often be overstated by self-build registers. In particular we find that many registers are rarely updated to remove those no longer in need of a self-build plot or to assess whether there is

double counting across registers. It will be important for the Council to ensure that its evidence on the need for self-build homes has been effectively reviewed if it is to offer a robust position on the demand for this type of development.

It will also be necessary for the Councils to consider how they support the self-build market in West Suffolk. Paragraph 57-025 of PPG sets out a range of different approaches all of which need to be thoroughly considered by the Council. Too often local plans seek to require demand for self-build plots to be met through their provision on allocated sites without proper consideration of the other approaches set out in PPG. Rather than set requirements for the provision of such plots on allocated sites we would suggest the Council seek to find suitable sites where the landowner is willing to provide self-build plots. Such an approach would also be consistent with PPG which states that Councils should work with landowners and encourage them to consider self-build plots but does not state that it should compel them to do so.

Climate Change

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.

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 delivery 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.

The industry will clearly need to take into account the Government's measures on the Future Homes Standard and Bio-Diversity Gain – both of which will be mandatory for new residential developments in 2020. In terms of these new regulatory targets applying to new development from 2025 onwards – to deliver the objectives of the Future Homes Standard – the industry, with the leadership of the HBF, will be commissioning work to consider what the industry can do, taking into account developments in research and product development within that timeframe, and what new standards can feasibly be adopted and implemented by the industry.

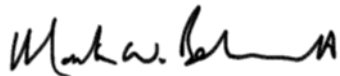
Therefore, when considering their approach to such matters the councils should ensure that they are working within the current policy and legislative framework and not seeking to deliver a different range of standards that will work against the collective

drive on this matter. The importance of a collective approach will also balance the cost of delivering the energy efficiency improvements required alongside other planning obligations and development aspirations that the Councils are seeking to deliver through the WSLP, such as meeting housing needs in full and improving the affordability of homes in this area. The Councils will therefore need consider the consequences of introducing planning policy burdens on new development recognising that the costs of these will ultimately be passed onto the consumer or leave some sites undeliverable.

Conclusion

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', with a stylized flourish at the end.

Mark Behrendt MRTPI
Planning Manager – Local Plans
Home Builders Federation
Email: mark.behrendt@hbf.co.uk
Tel: 020 7960 1616