

Sent by email to: planningpolicy@waverley.gov.uk

27/01/2020

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the Waverley Part 2 Local Plan

1. Thank you for consulting the Home Builders Federation (HBF) on the Part 2 Local Plan (LPP2). 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.

Housing supply

The plan is not effective as it does not provide sufficient flexibility in its housing allocation to ensure minimum housing requirements set out in the Local Plan Part 1 are met within the plan period.

2. Whilst the HBF does not want to comment on the sites set out in chapter 7 of the LPP2 we are concerned that there is no flexibility in the supply of homes in relation to the requirements in policy ALH1 of the Local Plan Part 1 (LPP1). This policy committed the Council to delivering 11,210 homes and established how these homes would be distributed across the Borough. It is also the case that the Council did not identify any additional delivery in the LPP1 to act as a buffer should any of allocated sites not come forward as expected.
3. This lack of flexibility has been taken forward into the LPP2 and must be addressed by the Council. The National Planning Policy Framework (NPPF) is clear at paragraph 11 that local plans must be flexible to adapt to rapid change and as such it must be expected for plans to deliver more homes than the minimum required. If plans seek to meet development requirements with no buffer in supply, then there is a far greater risk that needs will not be met in full. Any slippage in the delivery timescales of any site, or lower than expected windfalls for example will lead to supply being less than the minimum requirement and the plan failing to deliver one of its key objectives. Whilst some exceedances in supply have been identified in Godalming, we could find no evidence provided by the Council that



there will be any buffer in its overall supply. In contrast, the Council's evidence shows that delivery has been significantly slower than expected in the LPP1.

4. The latest monitoring report¹ published by the Council, for example, shows that for 2018/19 343 homes were built compared to their requirement of 590 homes and that the Council have a current shortfall over the plan period of 1,629 homes against current requirements in ALH1. Whilst the Council's 5-year land supply statement indicates that the shortfall in delivery currently faced by the Council will be addressed over the next five years the margin for error is small given that the Council can only show a 5.3-year land supply. Any further delays in the supply of new homes in the Borough would lead to the Council not having a five-year land supply as well as some of the homes being delivered beyond the end of the plan period.
5. This concern is amplified given that the Council's latest five-year land supply report shows that Dunsfold Park will now start delivering homes in 2022/23, some 4 years later than expected in the LPP1². However, even this estimate appears optimistic. Dunsfold Park received outline consent at appeal in March 2018, to build 1,800 new homes, however, the reserved matters application and the masterplan required to show how the site will ultimately deliver 2,600 dwellings by 2032 is still to be submitted. The only application that has been submitted is the reserved matters application (access, appearance, landscaping, layout and scale) for the new roundabout and associated works. As such there is still no consent in place for the full 2,600 dwellings that the Council expect to be delivered at Dunsfold and there must be concerns that development will commence later than currently expected and not deliver its full allocation within the plan period.
6. Even if the development at Dunsford Park were to start as stated by the Council the delays means that there would be 9 years from the expected start date to deliver 2,600 homes – 288 dwellings per annum. This would seem to be optimistic based on delivery rates of other similar sized developments. The second edition of Lichfields report Start to Finish³ outlines that the average annual build-out rate for a scheme of 2,000+ dwellings is 160dpa. Whilst we recognise that higher average rates can be delivered it is evident that this is not the norm and as such provides a compelling reason as to why the Council needs to ensure greater flexibility in its housing land supply.
7. To conclude, without a buffer there must be a concern that the Council cannot ensure that minimum number of homes it is required to plan for will be delivered. In such a scenario the plan is not deliverable across its plan period, as is required by national policy to be considered sound. In order to ensure the plan's soundness, the Council must allocate additional sites in the LPP2 to be certain that there is sufficient flexibility to ensure the minimum number of homes required for Waverley are delivered.

¹ Table 1, page 9 Waverly Borough Council Authorities Monitoring Report 2018/19 (April 2020)

² Page 63 Appendix 3 Five Year Housing Land Supply Position Statement (October 2020)

³ Start to Finish (Second Edition) (Lichfields, 2020) <https://lichfields.uk/content/insights/start-to-finish>

DM5: Safeguarding Amenity

The policy is unsound as it is not consistent with national policy.

8. Given that the National Planning Policy Framework makes it clear at paragraph 11 that plans should positively seek to meet the development needs of their area and be flexible, we are concerned that the approach taken by the Council could prevent development that will meet the needs of some its residents from coming forward. Whilst the HBF share the Council desires to see good quality homes delivered within Waverley we also consider that space standards can, in some instances, have a negative impact upon affordability issues and reduce customer choice. In terms of choice, 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 families on lower incomes to afford a property which has their required number of bedrooms. These concerns are especially pertinent in Waverley where affordability of housing is so poor.
9. It is therefore important that the Council can provide some flexibility in this policy to allow well designed homes that are below space standards that meet a specific need in the community to be developed. We would therefore recommend that the following amendment be included in the local plan:

a) meet, as a minimum, the DCLG's Technical Housing Standards – Nationally Described Space Standard (and/or subsequent revisions to this standard) as set out in Appendix I unless it can be demonstrated that the dwellings will meet a specific need in the Borough.

DM36: Self-build and Custom Housebuilding

The policy is unsound as it is not justified or consistent with national policy.

10. Whilst the HBF support the encouragement of self-build housing through local plans, we do not consider the requirement for all development of 20 or more dwellings to set aside 5% dwellings to be delivered through serviced plots for self-build and custom housebuilding to be justified or consistent with national policy.
11. As the Council will be aware the proposed policy must be based on robust evidence of both the demand for self-build plots and a consideration as to the impact on viability of this policy. With regard to the evidence on needs the Council state that there are currently 91 applicants on the register with 24 have satisfied the local connection test. Our first concern is that this does not suggest that there is a particularly high demand for self-build plots in Waverley that requires 5% of all on sites of over 20 units to be offered as plots to self-builders. The Council will therefore need to consider how many homes their policy is likely to provide and whether it is proportionate to the evidence. It is also necessary for the Council to indicate how many self-build homes have been granted permission since the

requirement to maintain a self-build register was introduced. The latest monitoring report⁴ indicated that to October 2019 32 plots had been granted permission. This is in excess of what was required and has been achieved without policy DM36. This would indicate that there is no need for such a policy to be adopted.

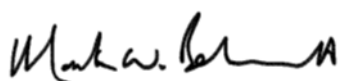
12. Secondly, the Council will also need to consider the robustness of their self-build register as an evidence base indicating demand for self-build plots. This is vital as the data on self-build registers is often flawed in that it does not consider whether individuals on such registers are on other registers in neighbouring areas and whether those on the list are still seeking a self-build plot. If the register has not been reviewed in this manner, we would suggest this is undertaken prior to the submission of the local plan.
13. Finally, it is important to recognise that paragraphs 57-024 and 57-025 of the PPG sets out a variety of approaches that need to be considered – including the use of the Council's 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. We would suggest that in the first instance rather than place additional burdens on house builders for the provision of self-build plots it should utilise its own land or seek to engage with landowners to identify suitable sites on which to deliver serviced self-build plots.
14. On the basis of the evidence presented we would suggest that there is no justification for the adoption of policy DM36 and as such it should be deleted.

Conclusions

15. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF, for the following reasons:
 - Failure to provide sufficient flexibility in housing supply to ensure the local plan is deliverable across its plan period;
 - A lack of flexibility in the application of the national described space standards;
 - Insufficient justification for the policy on self-build and custom housebuilding.

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully



⁴ Paragraph 104, Page 48 Waverly Borough Council Authorities Monitoring Report 2018/19 (April 2020)

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