

Sent by email to: localplan@dover.gov.uk

16/03/2021

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the Dover Local Plan

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

Strategic Policy 2: Housing Growth

2. We agree with the Council's assessment of its minimum housing needs as calculated using the standard method. However, it is important to recognise that should any of the inputs used to assess housing needs change the Council will need to update this policy prior to submission. The Council will also need to continue to work with its neighbours to ensure that they are able to meet their housing needs in full. This evidence should be clearly set out in statements of common ground not only with each of their neighbouring authorities but also those authorities adjoining the wider housing market area within which Dover is located.
3. In addition, the Council will need to consider whether there is a need to increase overall supply further to in order to better meet the overall need for affordable housing. The Council's update to the Strategic Housing Market Assessment indicates that housing needs represents a round 27% of total needs. Given the difficult viability facing development in the urban area of Dover it will be important that the Council gives consideration as to whether further allocations are required outside of town to improve provision of affordable housing. Such an approach would be consistent with paragraph 2a-024 of Planning Practice Guidance and it is important that this is given due regard by the Council when preparing its local plan for submission.
4. With regard to spatial options being proposed by the Council we would agree that the Council's preferred approach set out in paragraph 6.36 provides a reasonable basis on which to progress the local plan. However, the Council will need to



progress this option with caution given the stated concerns regarding the timely delivery of new development in Dover and when these homes will come forward over the plan period. The Council note in paragraph 6.6 that the existing growth strategy which focussed on Dover has never been fully realised with progress on delivery much slower than anticipated. To some extent this has been addressed by the Council with inclusion of a 10% buffer in its planned supply across the plan period and relatively cautious delivery expectations. However, given the past difficulties associated with delivery in Dover and the fact that nearly 50% of the additional homes allocated in this plan will be located there, we would recommend further allocations outside of Dover are included in the local plan to provide a 20% buffer in overall supply.

DM Policy 1 Reducing Carbon Emissions

5. 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 and considers a universal standard set through building regulations as the most appropriate way forward. As such we do not disagree with the intentions of this policy, but we do not consider it necessary to include the requirements set out in the Future Homes Standard within the local plan as these will likely be mandatory by the time it is adopted. The NPPF makes it clear in part f of paragraph 16 that local plans should avoid unnecessary duplication and as such we would recommend the second of DM1 is deleted. In addition, the Council should not require residential development to submit an energy statement in regard to building regulations as this is not a planning matter but one that will be addressed through building regulations.

DM Policy 4 Sustainable Travel

6. The HBF recognise that electric vehicles will be part of the solution to transitioning to a low carbon future. The Department of Transport consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019) set out the Government's preferred option to introduce a new requirement for electric vehicle charging points (EVCP) under Part S of the Building Regulations. What is evident from the Council's policy is that it is a direct response to this consultation. As such, the position is similar to that of the future home's standard outlined above. The Council should not be repeating legislation and should delete this policy prior to the changes being introduced through regulation are introduced.
7. The Council's policy approach should not compromise the viability of development. We note that the cost of EVCPs have been included in the Council's latest viability assessment and reflects the estimated an installation cost of approximately £976 per EVCP. However, the HBF and its Members also have serious concerns about the capacity of the existing electrical network in the UK. The supply from the power grid is already constrained in many areas across the country. Major network reinforcement will be required across the power network

to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard (also see HBF comments under DM1 above). These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery. The Government's current proposal automatically levies a capped figure of £3,600 on developers for upgrading local electricity networks, therefore this figure should also be included in the Council's viability assessment.

DM Policy 35 Digital Technology

8. Under DM Policy 35 residential developments will be expected to deliver gigabit-capable broadband. The HBF considers it inappropriate for the Council to impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations. Last year the Government confirmed in its Budget that future legislation to ensure that new build homes are built with gigabit-capable broadband. The Government will amend Part R "Physical Infrastructure for High-Speed Electronic Communications Networks" of the Building Regulations 2010 to place obligations on housing developers to work with network operators to install gigabit broadband, where this can be done within a commercial cost cap. The Department for Culture, Media and Sport (DCMS) has outlined its intentions on the practical workings of this policy, which will apply to all to new builds. Any type of technology may be used, which is able to provide speeds of over 1000 Mbps. All new build developments will be equipped with the physical infrastructure to support gigabit-capable connections from more than one network operator. The Council's approach is therefore unnecessary and repetitive of Building Regulations.

DM Policy 37 Quality Residential Accommodation

Nationally Described Space Standards

9. It is important to recognise that the optional technical standards can, as set out in paragraph 56-002 of Planning Practice Guidance (PPG), only be introduced where they are needed and where they do not impact on the viability of development. The application of space standards has been considered in the viability assessment; however, they could not find any evidence put forward to support space standards.
10. Whilst the HBF share the Council desires to see good quality homes delivered within Dover it remains essential that there is a comprehensive evidence base supporting the adoption of the national described space standards. The reason why the HBF considers this to be necessary is 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 on lower incomes can afford a property which has their required number of bedrooms.

11. If the Council wants to adopt space standards it must show that there is an endemic problem that homes being built in Dover are too small. The HBF is not aware of any evidence that market dwellings in Dover that do not meet the NDSS remaining unsold or that those living in these dwellings consider that their housing needs are not met. There is no evidence that the size of houses built are considered inappropriate by purchasers or dwellings that do not meet the NDSS are selling less well in comparison with other dwellings. 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.

Accessibility standards

12. The HBF recognises that the approach to accessibility standards is being considered by Government. However, until any changes are made if the Council wishes to adopt the optional standards for accessible & adaptable dwellings, then this should only be done in accordance with footnote 46 to paragraph 127 of the NPPF and the latest guidance in PPG. Footnote 46 states "*that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing where this would address an identified need for such properties*". As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate, and focussed tightly on supporting and justifying the policies concerned. The Council's evidence, as set out in the update to Strategic Housing Market Assessment, indicates that there is an increasing proportion of the population with a long-term limiting illness. This is inevitable given the ageing population seen across the Country. However, the Council's evidence has not considered other aspects with regard to needs such as whether those with a long-term limiting illness cannot have their housing needs met within their own home or another home in the second hand market.
13. Many of those households with a long-term limiting illness are already living in the District. Of these households, many will not move from their current home but will make adaptations as required to meet their needs. This situation is considered in the English Housing Survey 2014/15 noted that of those households in England that required an adaptation 81% felt that current home was suitable to needs. Alternatively, some will choose to move to another dwelling in the existing stock rather than a new build property and some, as has been identified in the SHMA, will want to live in specialist older person housing. Recent research by Savills "Delivering New Homes Resiliently" published in October 2020 shows that over

60's households "... are less inclined to buy a new home than a second-hand one, with only 7% doing so". The existing housing stock is considerably larger than the new build sector so adapting the existing stock is likely to form part of the solution and should be considered in the Council's evidence use to support this policy.

Conclusions

14. 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



Mark Behrendt MRTPI
Planning Manager – Local Plans
Home Builders Federation
Email: mark.behrendt@hbf.co.uk
Tel: 07867415547