

Planning Policy
Cheshire West and Chester Council
4 Civic Way
Ellesmere Port
CH65 0BE



SENT BY EMAIL
planningpolicy@cheshirewestandchester.gov.uk
14/09/2021

Dear Planning Policy Team,

CHESHIRE WEST AND CHESTER LOCAL PLAN: EARLY CONVERSATION 2021

1. Thank you for consulting with the Home Builders Federation (HBF) on the Local Plan Conversation 2021.
2. 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.

Climate Change

3. The Council should note that 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. The HBF considers that the Council should work with the homebuilding industry closely to ensure that any changes to the Plan are both realistic and viable, and that as far as possible they do not overlap with changes being made at a national level.
4. There are numerous potential policy approaches that could contribute to mitigating against climate change and help towards a zero-carbon future including: reducing greenhouse gases; the location of development and services; active and sustainable transport; digital technology and connectivity; water issues; energy provision; the impact of development on biodiversity and nature; what resources are used, and waste is produced; air quality; flood and climate resistance; the wider effect housing has on its social and built environment. However, these policies may also require input and collaboration from a broad range of stakeholders, which will also need to be given consideration. Technologies will need to be developed and proved and then mainstreamed – not least with regards to post gas heating solutions; whilst consumers will need to be consulted with and educated as new technologies emerge. Supply chains will need to be created; new skills and training developed for production and maintenance of new technologies, and person capacity built. The Council will need to



ensure that the any policies introduced are deliverable and viable and have the support of all of the industries and sectors involved.

5. The Council should note that a new cross sector Future Homes Task Force has announced that a multi-million-pound Delivery Hub will be set up to manage the home building industry's drive to meet the environmental targets set out by Government. The Task Force comprises of representatives from across all the sectors that shape new homes including government, house building, utility provision, material suppliers and environmental groups. On 27 July 2021, the Future Homes Delivery Plan was published (see The Future Homes Delivery Plan – Summary of the goals, the shared roadmap & the Future Homes Delivery Hub).

Housing

6. The HBF considers that the Council should ensure that they set an appropriate housing requirement to meet their housing need. The standard method identifies a minimum annual housing need figure and represents the starting point for determining the number of new homes in the area. However, it is likely that for Cheshire West and Chester there will be circumstances, as set out in the PPG¹, where it is appropriate to plan for a higher housing need figure than the standard method identifies. These circumstances include where there are growth strategies, strategic infrastructure improvements, an unmet need from neighbouring authorities or where previous levels of housing delivery in the area or previous assessments of need are significantly greater than the outcome of the standard method. For example, it is noted that for the period 2015/16 to 2019/20 the Council delivered an average of 2,068 dwellings per annum (dpa)².
7. The HBF supports the Council in looking to address the need for affordable homes, the Council will need to ensure that it has an up-to-date assessment of the affordable need and of the viability of development, in order to inform their policy approach. The Council will also need to ensure they give consideration to the delivery of First Homes and affordable homes ownership products in line with the NPPF and the PPG.
8. The HBF considers that the Council will need to ensure that they work closely with the industry to ensure that any policies in relation to housing mix, density, size or design are appropriate, suitable to the market and deliverable. The HBF recommends a flexible approach is taken to any policy approach which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides appropriate homes for the location and market.

Land and Sites

9. The HBF is keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The widest possible range of sites by both size and market location are required so that small, medium and large

¹ ID: 2a-010-20201216

² MHCLG Table 122 Net Additional Dwellings

housebuilding companies have access to suitable land to offer the widest possible range of products. A mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. Under the NPPF, the Councils should identify at least 10% of the housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue.

10. The Plan should ensure the availability of a sufficient supply of deliverable and developable land to deliver the Council's housing requirement. This sufficiency of housing land supply (HLS) should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (YHLS), and achieve Housing Delivery Test (HDT) performance measurements.

Future Engagement

11. 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.
12. The HBF notes that other Councils have set up key stakeholder workshops to engage with housebuilders, developers and planning consultancies to debate the opportunities and challenges in the local housing market, and to discuss the benefits and positive impacts of residential development. The Council may find it is beneficial to organise similar meetings as they take their plan forward.
13. 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,



Joanne Harding
Planning Manager – Local Plan (North)
Email: joanne.harding@hbf.co.uk
Phone: 07972 774 229