

Bournemouth Christchurch & Poole Council
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25 March 2022

Dear Sir / Madam

BOURNEMOUTH CHRISTCHURCH & POOLE (BCP) LOCAL PLAN – ISSUES & OPTIONS CONSULTATION

Thank you for consulting with the Home Builders Federation (HBF) on the above-mentioned consultation. 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. The following responses to specific questions in the BCP Local Plan Issues & Options document have been submitted via the Council's online consultation portal.

NEW MARKET AND AFFORDABLE HOMES

**How strongly do you agree or disagree with each of the two options?
Please explain your answers.**

Option 1 : Try to meet the number of homes identified as needed through the government's standard housing method of a minimum of 2,667 homes a year, or 42,672 homes to 2038.

Option 2 : Identify a lower locally derived housing need figure that deviates from the government's standard methodology but still reflects our aspirations for growth. Initial findings indicate this would be a minimum of 1,600 homes a year or 25,600 homes to 2038.

The HBF strongly agree with Option 1 and strongly disagree with Option 2.

As set out in the 2021 NPPF, the determination of the minimum number of homes needed should be informed by Local Housing Needs (LHN) assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 61). The NPPG also emphasises that there is an expectation that the standard method will be used and any other method will be used only in exceptional circumstances. If the Council feels that circumstances warrant an alternative approach, the Council can expect this to be scrutinised more closely at the BCP Local Plan Examination (ID 2a-003-20190220).



The Council's locally derived housing need figure (Option 2) is based on an alternative model, which uses 2014 projects but with adjustments applied to migration trends. This results in a locally derived housing need figure of 1,600 dwellings per annum, which is 1,067 dwellings per annum less than the LHN of 2,667 dwellings per annum using the standard methodology. The standard method uses 2014-based household projections without adjustments to ensure that historic under delivery of housing and declining affordability are reflected and for consistency with the Government's objective of significantly boosting the supply of homes (ID 2a-005-20190220). Housing affordability across BCP area is acute. In 2020 the median house price to median gross annual workplace-based earnings was 9.67 compared to 7.84 in England and 8.80 in South West. Option 2 will not meet the Council's own proposed objective "to provide a sufficient supply of new market and affordable homes to meet the different needs of our communities". The locally derived housing need of 1,600 dwellings per annum will not meet future demand (as identified by the standard methodology), address housing affordability nor meet the Council's aspirations for growth.

Furthermore, the Council has identified a total possible housing land supply (HLS) for circa 43,000 dwellings, which exceeds the minimum LHN using the standard method. Even if, there is a reduction in some potential sources of HLS, on-going discussions with neighbouring Dorset Council may conclude that some unmet needs can be accommodated outside BCP area.

Option 1 should be pursued rather than Option 2, which results in a lower housing need figure than the standard method. If the alternative approach (Option 2) is pursued, the Council will need to demonstrate through robust evidence, that its locally derived housing needs figure is based on realistic assumptions of demographic growth and there are exceptional local circumstances that justify deviating from the standard method. This will be rigorously tested at the BCP Local Plan Examination.

How strongly do you agree or disagree with the recommendation for providing affordable housing? Please explain your answers.

Recommendation: To meet our demand for affordable housing, we will require a proportion of new homes on major sites to be affordable. This proportion may vary across the BCP area. We will set out the type or tenure of affordable housing and the circumstances where this should be provided on site, and where a payment towards affordable housing on major sites would be accepted.

The HBF agree that a proportion of new housing on major sites should be affordable housing. The HBF also agree that due to differences in viability, the percentage of affordable homes required on major sites will vary across different parts of the BCP area. The type and tenure of affordable housing should comply with the 2021 NPPF expectation that proposals make provision for at least 10% of the overall number of homes is available for affordable home ownership (para 65) and the 21 May 2021 Written Ministerial Statement

requirement that at least 25% of all affordable homes delivered through developer contributions are First Homes.

How strongly do you agree or disagree with the recommendation for providing custom self build housing plots? Please explain your answers.

Recommendation: To make plots available for self-build housing we could require a proportion of plots on large, strategic housing sites to provide an area of self-build.

The HBF strongly disagree with the Council's recommendation for providing custom self-build housing plots. There is no legislative or national policy basis for imposing an obligation on landowners or developers of large strategic housing sites to set aside plots for self & custom build housing. Under the Self Build & Custom Housebuilding Act 2015 and 2021 NPPF (para 62), it is the responsibility of the Council, not landowners or developers, to ensure that sufficient permissions are given to meet demand. The Council are not empowered to restrict the use of land to deliver self & custom build housing. The NPPG sets out ways in which the Council should consider supporting self & custom build by "engaging" with developers and landowners and "encouraging" them to consider self & custom build "where they are interested" (ID 57-025-201760728).

In BCP, the demand for custom self-build housing is minimal with only an average of 55 people applying to the Council's Register per year. This simple reference to the headline number of entries on the Register may over-estimate actual demand. The Register may indicate a level of expression of interest in self & custom build but cannot be reliably translated into actual demand should plots be made available because entries may have insufficient financial resources to undertake a project, be registered in more than one Local Planning Authority area and have specific preferences.

The provision custom self-build housing plots on large strategic housing sites adds to the complexity and logistics of development. It is difficult to co-ordinate the provision of such plots with the development of the wider site raising both practical and health & safety concerns. Unsold plots should not be left empty to the detriment of neighbouring dwellings or the whole development. As well as on-site impracticalities, the provision of custom self-build housing plots will have a bearing on the development economics of large strategic housing sites. These impacts should be tested in an updated Viability Assessment.

How strongly do you agree or disagree with the recommendation for providing the right mix and type of homes? Please explain your answers.

Recommendation : A mix of all housing types and sizes are needed across Bournemouth, Christchurch and Poole. In order to provide flexibility, we would not propose to prescribe a set housing mix, apart from on large, strategic development sites over 40 homes.

All households should have access to different types of dwellings to meet their housing needs. The HBF agree that the Council's policy approach should be flexible rather than prescriptive. Not all sites over 40 dwellings will be able to meet an overly prescribed housing mix because of site size, proposed development typology, site specific circumstances and viability. The Council's initial Housing Needs Assessment (HNA) shows that a mix of all housing types and sizes are needed with the greatest need for 2 & 3 bedroomed market homes and 1 & 2 bedroomed affordable homes. As well as evidence from the Council's HMA, market signals are important in determining the size and type of homes needed. To ensure that specifically identified housing needs are met, the Council should focus on allocating suitable sites for a wide range of different types of development across a wide choice of appropriate locations rather than setting overly prescriptive housing mixes for individual sites of more than 40 dwellings.

How strongly do you agree or disagree with the recommendation for providing homes for older people and those with disabilities? Please explain your answers.

Recommendation : All homes should meet Part M4(1) of the building regulations to be accessible. Given there is a high and growing proportion of older people, and a significant proportion of people with a long-term health problem or disability in our area, we propose also that all homes should meet the M4(2) higher accessibility standards to provide homes to meet changing needs over time, and 10% of homes should achieve the M4(3) standard of being wheelchair accessible, subject to viability testing.

The HBF strongly disagree with the recommendation. If the Government implements proposed changes to Part M of the Building Regulations as set out in the "Raising Accessibility Standards for New Homes" consultation, which closed on 1 December 2020, the Council's proposed policy approach will be unnecessary. In the meantime, if the Council wishes to adopt the optional standards for accessible & adaptable dwellings, then this should only be done in accordance with the 2021 NPPF (para 130f & Footnote 49). The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in the NPPG (ID 56-005-20150327 to 56-011-20150327). A policy requirement for M4(2) & M4(3) dwellings must be justified by credible and robust evidence.

Not all health issues affect housing needs. All new homes are built to M4(1) "visitable dwelling" standards, which are not usually available in the older existing housing stock. These standards benefit less able-bodied occupants and are likely to be suitable for most residents. Many older people already live in the BCP area and are unlikely to move home. Those who do move may not choose to live in a new dwelling. 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 significantly larger than its new build

component, therefore adaption of existing stock will form an important part of the solution.

If the requirements for M4(2) & M4(3) are carried forward, account should be taken of site-specific factors such as vulnerability to flooding, site topography and other circumstances which may make a specific site less suitable (NPPG ID 56-008-20160519). Additional costs associated with M4(2) and M4(3) compliant dwellings should be included in an updated Viability Assessment. The Council is also reminded that the requirement for M4(3) should only be required for dwellings over which the Council have housing nomination rights (NPPG ID 56-008-20150327).

To provide homes for older people, the Council should consider allocating sites for older persons housing subject to criteria such as the proximity of sites to public transport, local amenities, health services and town centres.

Any other comments about new market and affordable homes in the Local Plan.

To meet a minimum LHN of 42,672 dwellings (2,667 dwellings per annum) up to 2038, the Council has identified a total possible housing land supply (HLS) for circa 43,000 dwellings from the following potential sources of supply :-

- circa 34,000 dwellings on 120 identified sites in the existing built-up area;
- circa 4,000 dwellings from increased densities on some sites in the existing built-up area ;
- circa 1,000 dwellings from review of heritage conservation areas ; and
- circa 4,000 dwellings from possible Green Belt release.

The HBF acknowledge that the Council should make as much use as possible of brownfield sites in existing urban areas (2021 NPPF para 119), “*town cramming*” should be avoided, which will provide insufficient variety in house typologies to create balanced communities with the right types of new homes to meet the housing needs of different groups. There will also be a limited capacity for higher densities and more taller buildings, which will only be appropriate in certain locations. A blanket approach to the intensification of housing densities everywhere will be inappropriate as a range of differing densities will be needed to ensure development is in keeping with the character of the surrounding area. The setting of residential density standards should be undertaken in accordance with the 2021 NPPF (para 125). Moreover, the future deliverability of intensely developed residential schemes will be dependent on the viability of brownfield sites and market demand for high density urban living post Covid-19.

The HBF support the Council’s proposed potential release of land from the Green Belt. Densification alone will not meet all residential development needs because of insufficient availability of brownfield sites, restricted capacity and competing demands from employment uses in the existing urban areas (see A Prosperous Economy – Protecting Existing Employment Areas - Option 1), the

2021 NPPF sets out that the Council should promote sustainable patterns of development by considering the location development in urban areas inside the Green Belt boundary, in towns and villages inset within the Green Belt or in locations beyond the outer Green Belt boundary (para 142). As set out in 2021 NPPF, where fully evidenced and justified Green Belt boundaries can be altered in "*exceptional circumstances*" through the preparation or updating of Local Plans (paras 140 & 141).

The HBF have no comments on individually identified potential housing sites and these representations are submitted without prejudice to any comments made by other parties. However, the HBF emphasise that to optimise housing delivery, the widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. The Council's overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market.

How strongly do you agree or disagree with the recommendation for considering transport impacts from new development? Please explain your answers.

*Recommendation : When submitting planning applications, we will propose that developers consider a range of transport requirements including :-
(f) electric charging points.*

The HBF strongly disagree with Bullet Point (f), which is unnecessary and repetitious of Part S of the Building Regulations. The Department of Transport Consultation Response : Electric Vehicle Charging Points (EVCP) in Residential & Non-Residential Buildings dated November 2021 confirmed that from June 2022 new dwellings with associated parking will have at least 1 EVCP per dwelling.

How strongly do you agree or disagree with the recommendation and two Options for ensuring a high standards of amenity? Please explain your answers.

Option 1: Setting internal space standards for new residential development in line with the Nationally Described Space Standards (NDSS).

The HBF strongly disagree Option 1. If the Council wishes to apply the optional NDSS to all dwellings, then this should only be done in accordance with the 2021 NPPF (para 130f & Footnote 49). The NPPG sets out that "*where a need*

for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing” (ID: 56-020-20150327). Therefore, the Council should provide a local assessment evidencing its case. There is a direct relationship between unit size, cost per square metre (sqm), selling price per sqm and affordability. The impact of NDSS should be fully accounted for in an updated Viability Assessment. The Council should also recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provided a good, functional home. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing. An inflexible policy approach imposing NDSS on all housing removes the most affordable homes and denies lower income households from being able to afford homeownership. If the proposed requirement for NDSS is carried forward, the Council should put forward proposals for transitional arrangements.

How strongly do you agree or disagree with each of the two Options for ensuring new developments will be built to reduce their energy use and minimise carbon emissions? Please explain your answers.

Option 1 : Allow new development to comply with the national building regulation (Part L) requirements.

Option 2 : Set a higher local standard beyond the building regulations (Part L) requirements.

The HBF strongly agree with Option 1 and strongly disagree with Option 2. It is the Government’s intention to set standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council’s specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council does not need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift, which are effective from June 2022, and proposals for the 2025 Future Homes Standard.

Conclusions

In conclusion it is hoped that these responses are helpful to the Council in informing the next stages of the BCP Local Plan. If the Council require any further information or assistance, please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



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