

## Home Builders Federation

### Matter 9

## WAVERELY LOCAL PLAN EXAMINATION

### Matter 9: Housing mix and standards

Issue(i) Is the LPP2's approach to self-build and custom housebuilding justified and consistent with national policy?

1. Is Policy DM36's requirement for 5% of dwelling plots on developments of 20 or more homes to be available for self-build or custom housebuilding justified?

The only evidence produced by the Council appears to be within the supporting text and the Council's Authority Monitoring Report (AMR). This evidence indicates that in the three years to 2019/20 monitoring period just 91 individuals or groups have registered on the self-build register with only 24 qualified for part 1 - having satisfied the local connection test and paid the required fee. It is also notable that at the end of the fifth base period the Council had granted permission for 38 self-build or custom housebuilding plots. As noted in paragraph 102 of the 2019/20 AMR significantly more than what it was required to provide at this point in time. This would suggest that the need for self-build plots can be met through windfall development and that the requirement for custom and self-build plots on developments of 20 or more homes is not required or overly onerous.

What is also missing from the Council's evidence is any indication as to how many plots will be delivered through this policy and how this relates to the expected level of demand for these plots. Without such a consideration there is no understanding as to whether the policy will result in plots being left unnecessarily empty prior to them reverting to the developer to be built out.

A 20-unit threshold is relatively low for such a policy which in general tend to be applied to much larger sites in other areas. One key concern with having such a low threshold is that it is impossible to separate the self-build plots from the rest of the site which creates difficulties with regard to health and safety on a site with self-builders working alongside the main contractors delivering the rest of the development. There are also concerns that the self-build sites will take much longer to complete or could be left undeveloped to the detriment on the other residents. Finally, there is a risk that a small site could be largely built out before any unsold plots would return to the developer



given the requirement to market for 12 months and then obtain the amendments to the planning application. To return to the site to complete those units creates additional cost to the developer, leaves undeveloped plots on such sites, and could potentially delay the completion and of units on unsold plots and their eventual occupancy.

The evidence would suggest that the Council can address its duties on self-build through windfall development and as such the policy is not needed. However, if a policy is considered necessary then the evidence of need indicates that both the size threshold be increased, and percentage requirement reduced. If the threshold remains unchanged then we would also suggest the marketing period be reduced to 6 months to reduce the negative impact on smaller sites of empty plots.

*2. Does the 5% approach accord with advice given in the 'Self-build and custom housebuilding' PPG insofar as it states that Councils should consider how local planning policies may address identified requirements, for example, as a number of units required as part of certain allocated sites, or on certain types of site (with my emphases)?*

The 5% requirement is not inconsistent with advice provided in NPPG. However, PPG does also reference the wider role of local authorities in bringing forward suitable land such as using their own land and working with developers to encourage them to consider self-build rather than imposing a requirement on all development to provide plots. There does not appear to be any evidence that the Council has considered other approaches to increasing the supply of self-build plots.

*3. Is it clear how Policy DM36 would apply to proposals for apartments or other forms of housing (such as terraces) where it may be more challenging to deliver standalone self-build plots, and would it be effective in these terms?*

The Council should be clear in policy that the plot requirement does not apply to flatted development where it the delivery of fully serviced self-build plots would clearly compromise the delivery of such development.

*4. Have the viability implications of the self-build requirement been considered?*

No comment

***Issue (ii) is the LPP2's approach to the nationally described space standard, housing conversions and affordable housing justified, effective and consistent with national policy?***

Space Standards

*1. Does Policy DM5's requirement for housing developments to meet the Nationally Described Space Standard address a clearly evidenced need, and has its impact on viability been considered?*

Whilst the Council have examined whether there are currently homes being built below space standards it has not considered whether it may impact the affordability of some types of home. As we set out in our representations 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. The HBF is generally supportive of space standards but consider that it is necessary for some flexibility to be included in local plans to allow well designed homes that are below space standards that meet a specific need in the community to be developed.

2. Has the Council taken into account whether a reasonable transitional period is needed following the adoption of the new policy on space standards to enable developers to factor the costs of these into future land acquisitions?

The HBF consider it necessary for a transition period to be included to allow developers to factor in the costs of these developments in future and not impact negatively on development expected to come forward in the short term.

3. Would the factors relating to balconies and private gardens set out in paragraphs 2.40 and 2.41 be more appropriately set out in the Policy DM5 itself, and what is the justification for these requirements?

No comment

4. What is the justification for the space requirements set out in Policy DM5(2)(c) relating to the size of outdoor amenity space, and would the policy be effective in securing acceptable provision of amenity space?

No comment

5. Would it be clear to a decision-maker how to assess applications where private balconies would not accord with the aspects set out in paragraphs 2.39 and 2.40 of LPP2; what is the justification for these considerations; and should these aspects be referred to or included in Policy DM5 itself in the interests of effectiveness?  
Housing Conversions

No comment

6. Is Policy DM35 clear insofar as to whether the loss of 5 or more dwellings as a result of housing amalgamation proposals is to be taken as a net or gross figure? What is the justification for this aspect of Policy DM35?

No comment

7. Is the statement in the last sentence of paragraph 6.4 of LPP2 consistent with the contents of Policy DM35, and would it be clear to a decision-taker how to react to relevant development proposals?

No comment

Mark Behrendt MRTPI  
Planning Manager – Local Plans SE and E