

Development Plan Team
Tamworth Borough Council
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SENT BY EMAIL
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Dear Planning Policy Team,

TAMWORTH LOCAL PLAN 2043: ISSUES AND OPTIONS DOCUMENT

1. Thank you for consulting with the Home Builders Federation (HBF) on the Tamworth Local Plan 2043 Issues and Options document.
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.

Plan Period

Feedback Point 1

3. It is proposed that the end date of the new Plan should be 2043. It is noted that the NPPF¹ states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery. The HBF considers that the Plan period to 2043 may be appropriate as long the Plan is prepared efficiently and that this still provides a 15-year period at the point at which the Plan is adopted, however, if larger scale developments are proposed in the Plan, then a longer period will be required.

Vision and Objectives

4. The HBF notes objective 3 which states that the Plan should 'Provide a supply of high quality and affordable homes to meet the needs of all sections of our community'. Whilst the HBF agrees this is important, it is also important to ensure that sufficient market and affordable homes are provided to meet the current and future identified local housing need.

Climate Change and Biodiversity

Feedback Point 3

¹ NPPF 2021 Paragraph 22



5. The HBF considers that it would be most appropriate to rely on national standards and building regulations to set the carbon reduction levels for new buildings. The HBF generally supports sustainable development and considers that the homebuilding industry can help to address some of the climate change emergency challenges identified by the Council. However, the HBF recognises the need to move towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable.
6. Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations were updated in 2021 and took effect from 15th June 2022, with transitional arrangements in place for dwellings started before 15th June 2023. To ensure as many homes as possible are built in line with new energy efficiency standards, these transitional arrangements will apply to individual homes rather than an entire development.
7. The Government Response to The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings dated January 2021 provided an implementation roadmap. The 2021 Building Regulations interim uplift will deliver homes that are expected to produce 31% less CO₂ emissions compared to current standards. The implementation of the Future Homes Standard 2025 will ensure that new homes will produce at least 75% lower CO₂ emissions than one built to previous energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.

Feedback Point 5

8. The HBF notes the biodiversity approach proposed and would remind the Council of the impact that the need to provide biodiversity net gain can have on the efficient use of land and the density of development, and would suggest that this is taken in to consideration when allocating land, preparing policies related to the efficient use of land and the viability assessment of development. The HBF would also note that the creation of net biodiversity gain is a significant benefit of increased housing development and should be considered as such as part of any assessment of the housing requirement and housing allocations.

New and Affordable Homes

Feedback Point 9

9. The HBF considers that the Council should use the Standard Method as the starting point for determining the housing requirement, as set out in the NPPF and the PPG. However, the HBF also recommends that the Council consider the potential circumstances when it might be appropriate to plan for a higher housing need figure than the standard method indicates as set in the PPG². This includes growth strategies for the

² PPG: 2a-010-20201216

area, strategic infrastructure improvements, taking unmet need from neighbouring authorities, previous levels of delivery or previous assessments of need.

10. When considering the level of housing land supply to meet the housing requirement the HBF recommends that the Council ensure that they give consideration to an appropriate level of flexibility within the supply to ensure that the Plan is robust and resilient to change.

Feedback Point 12

11. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. The PPG³ identifies the type of evidence required to introduce a policy requiring the M4 standards, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.
12. The Council should also note that the Government response to the Raising accessibility standards for new homes⁴ states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy in place and where a need has been identified and evidenced.

Feedback Point 13

13. The HBF considers that a policy which encourages self and custom-build development and sets out where it will be supported in principle would be appropriate. The HBF also considers that allocating sites specifically for self and custom-build home builders could also be appropriate, however, this would need to be done through discussion and negotiation with landowners. The HBF does not consider that requiring a proportion of large housing sites to be available for self-builders is appropriate. The HBF would be interested to know whether any of the people on the self-build register have identified a preference to living on a large housing site, and whether the Council considers that there would be evidence of a demand for such sites. The HBF would also highlight the practical issues in terms of developing a large site where there are self-build plots on site, with potentially different builders and construction programmes. The Council will also need to consider the viability implications of this provision on larger housing sites.

Feedback Point 14

14. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing

³ ID: 56-007-20150327

⁴ <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response#government-response>

delivery will not be compromised or stalled due to overly prescriptive requirements, requiring a mix that does not consider the scale of the site or the need to provide significant amounts of additional evidence. The HBF considers that flexibility will be important in any policy in relation to housing mix, this allows developers to consider not only the identified need but also market aspirations, local and site characteristics and viability.

15. The HBF considers that any affordable housing split will need to take into consideration the need to provide affordable home ownership products including First Homes in line with national policy. The NPPF⁵ states that where major development involving the provision of housing is proposed, planning policies and decision should expect at least 10% of the total homes to be available for affordable home ownership. The PPG⁶ states that First Homes are the Government's preferred discount market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations. The HBF also considers that it is important that the Council considers the viability implications in relation to affordable housing provision, and ensure that the policy includes flexibility to allow the proportion of affordable housing or the tenure of affordable housing to be amended if needed due to viability issues or due to changes in demand in affordable housing provision.
16. The HBF notes that the nationally described space standards (NDSS) as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. PPG⁷ identifies the type of evidence required to introduce such a policy. It states that where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas: Need, Viability and Timing. The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above.

Infrastructure

Feedback Point 29

17. Viability is a key issue in determining the soundness of the Local Plan at Examination. Without a robust approach to viability assessment, land will be withheld from the market and housing delivery will be threatened, leading to an unsound Local Plan and housing delivery targets not being met. In plan-making, viability is inseparable from the deliverability of development. The viability of individual developments and plan policies should be tested at the plan making stage. As set out in the NPPF, the contributions expected from development including the level & types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. should be set out in the Local Plan. Development should not be subject to such a scale of obligations that the deliverability of the Local Plan is threatened. Viability assessment should not be conducted on the margins of viability. If the resultant Benchmark Land Value (BLV) is

⁵ Paragraph 65 of NPPF 2021

⁶ PPG ID: 70-001-20210524

⁷ PPG ID: 56-020-20150327

lower than the market value at which land will trade, then the delivery of housing targets will not be met.

Future Engagement

18. 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.

19. 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,

A handwritten signature in black ink, appearing to read 'J. Harding', written in a cursive style.

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