

Strategic Planning and Placemaking,
Stafford Borough Council,
Civic Centre,
Riverside,
Stafford,
ST16 3AQ



SENT BY EMAIL
strategicplanning@staffordbc.gov.uk
09/12/2022

Dear Planning Policy Team,

STAFFORD LOCAL PLAN 2020-2040: PREFERRED OPTIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Stafford Local Plan 2020-2040 Preferred Options consultation 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.

Policy 1: Development Strategy

3. This policy states that in the period 2020 to 2040 provision will be made for 10,700 new homes (535 new homes each year). The policy also sets out the broad spatial distribution of housing, including 59% of development in Stafford, 24% in Meecebrook the new garden community and 7% in Stone.
4. The 535 dwellings per annum (dpa) is a reduction from the adopted Local Plan which plans for 500 new homes each year for the period 2011 to 2031. However, the 535dpa is above the figure identified by the standard method local housing need (LHN) calculation which the Plan states is 391dpa in 2022. The HBF generally supports the Council in utilising a housing figure over the LHN, as 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. There may be circumstances, as set out in the PPG¹, when 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.
5. The Plan states that in addition to the Borough's own housing need, the development strategy also allows for 2,000 homes as a contribution to meeting unmet need of other

¹ ID: 2a-010-20201216



authorities in the region, which are subject to ongoing negotiations with other regional authorities.

6. The Stafford Economic and Housing Development Needs Assessment (EHDNA) (2020) identifies a range of housing needs scenarios including 435 dwellings per annum (dpa) to support the CE baseline forecast, 647dpa to support the CE jobs growth: Regeneration scenario and 683dpa to support the Past Trends scenario. The EHDNA (2020) also identifies an affordable housing need of between 252dpa and 389dpa dependent on the proportion of income used in the calculation. The EHDNA notes that this is a significant proportion of the local housing need based on the standard method. The PPG² states that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.
7. The Borough's past rate of net housing delivery (shown in Table 1 below) against the Local Plan's housing requirement of 500 dpa highlights that over the last 10 years the Council have delivered more than 600dpa on average. This level of delivery above the standard minimum suggests that there could be a greater level of housing need in the Borough compared to that identified by the standard methodology.

	2012 / 13	2013 / 14	2014 / 15	2015 / 16	2016 / 17	2017 / 18	2018 / 19	2019 / 20	2020 / 21	2021 / 22	Average
Stafford Completions	298	246	418	688	1,010	863	699	752	614	506	609

8. The HBF considers that the housing requirement for Stafford should be increased, and that it is important that the proposed housing requirement is viewed as a minimum and barriers are not put in place which may hinder greater levels of sustainable growth. It is considered that the plan could facilitate higher levels of growth by providing greater flexibility.

Policy 4: Climate change development requirements

9. This policy requires the production of an embodied carbon assessment for all major development. Part B of the policy looks for all residential development to demonstrate net zero carbon operation all through an energy statement, it also looks for no on-site fossil fuel combustion; minimised energy use and maximisation of on-site renewables. In terms of the minimised energy the policy looks for a space heating demand of less than 15kWh/m²/year and operational energy use of less than 35kWh/m²/year. It also suggests alternatively, compliance can be demonstrated through Passivhaus Standard accreditation.
10. The HBF generally supports sustainable development and considers that the homebuilding industry can help to address some of the climate change emergency

² ID: 2a-024-20190220

³ Table 122: Housing Supply: net additional dwellings, by local authority district, England (<https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing>)

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.

11. 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.
12. 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.
13. As set out in the NPPF⁴, 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. Therefore, if the Council wishes to move away from these national standards it will need to provide up to date and locally specific evidence as to why this is the case. The Council will also need to justify the requirement for the space heating demand of less than 15kWh/m²/year and operational energy use of less than 35kWh/m²/year.
14. Part E of the policy states that development must also incorporate water efficient features and equipment to achieve a maximum water usage of 110 litres per person per day. It also looks for development to demonstrate that opportunities to incorporate sustainable design features such as rainwater harvesting, green roofs, use of recycle materials and orientation have, where feasible, been maximised.
15. Under current Building Regulations, all new dwellings must achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the PPG⁵. The PPG references “helping to use natural resources prudently ... to adopt proactive strategies to ... take full account

⁴ Paragraph 31

⁵ PPG ID 56-013-20150327 to 56-017-20150327

of water supply and demand considerations ... whether a tighter water efficiency requirement for new homes is justified to help manage demand”

Policy 23: Affordable housing

16. This policy looks for major development to provide affordable housing, it sets differing proportions dependent on location and whether the site is greenfield or brownfield, with a range from 40% to 0%. It also sets a tenure mix of 65% social rented housing, 25% First Homes and 10% shared ownership.
17. The EHDNA identifies an affordable housing need of between 252dpa and 389dpa, dependent on the proportion of income used, it also suggests an affordable housing split of circa 70% social / affordable housing and circa 30% intermediate housing.
18. The HBF supports the need to address the affordable housing requirements of the borough. The NPPF⁶ is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. The Local Plan and CIL Viability Assessment (September 2022) highlights the issues with viability in the area, and the conclusions highlight the challenges particularly in the low value and brownfield areas and for the Strategic Sites.
19. The NPPF⁷ is also clear that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership. The HBF is concerned that the proposed policy will not deliver this requirement, if this is to be the case the HBF recommends that the Council provide the appropriate evidence.

Policy 24: Homes for Life

20. This policy states that on major developments at least 10% of all new build dwellings should be built to M4(2) standards. It goes on to state that on developments that would provide 10 or more affordable dwellings at least 10% of those dwellings should be M4(3) wheelchair accessible standard.
21. 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.
22. PPG⁸ identifies the type of evidence required to introduce such a policy, 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. It is incumbent on the Council to provide a

⁶ Paragraph 34

⁷ Paragraph 65

⁸ ID: 56-007-20150327

local assessment evidencing the specific case for Stafford which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommends that an appropriate transition period is included within the policy.

23. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, this is not just in relation to the ability to provide step-free access.
24. The Council should also note that the Government response to the Raising accessibility standards for new homes⁹ 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.
25. Part C also states that 100% of age restricted general housing, retirement housing or extra housing should be M4(2). As highlighted above, this policy requirement may no longer be required if the Government amend the building regulations.
26. The Council will also need to ensure that the viability implications of the M4(2) and M4(3) requirements are fully considered in relation to the viability assessments of both market housing and older persons housing.
27. Part D of the policy requires all new homes to as a minimum meet the nationally described space standards (NDSS).
28. The HBF considers that if the Council wishes to apply the optional NDSS to new build dwellings, then this should only be applied in accordance with the NPPF¹⁰ which states that policies may also make use of the NDSS where the need for an internal space standard can be justified. As set out in the NPPF¹¹ 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.
29. PPG¹² 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** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be

⁹ <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>

¹⁰ Paragraph 130(f) and footnote 49 of NPPF 2021

¹¹ Paragraph 31 of NPPF 2021

¹² ID: 56-020-20150327

properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

- **Viability** – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.

30. The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.

Policy 31: Housing Mix and Density

31. This policy looks for all new housing to contribute to the delivery of a range of housing types and sizes with the area. Part B looks for certain sites to provide plots equivalent to 1% of all dwellings to be made available to self or custom builders as serviced plots at reasonable market rates. Whilst Part C states that densities should be informed by prevailing densities, higher densities will be supported in certain circumstances.
32. 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. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location and market.
33. The HBF would be keen to understand the evidence to support the need for custom and self-build housing in Stafford, and how it has informed the requirements of Policy 31. PPG¹³ sets out how custom and self-build housing needs can be assessed. The EHDNA¹⁴ states that the LPA has had 36 registrations of interest in Self-build plots as of December 2018 and goes on to state that therefore, the demand for self-build is considered to be limited.
34. The HBF does not consider that the Council has appropriate evidence to support the requirement for developers on the sites listed to provide service plots for custom or self-build housing. The HBF is concerned that as currently proposed this policy will not assist in boosting the supply of housing and may even limit the deliverability of some sites and homes. The HBF is also not clear whether there is even a demand from custom and self-builders to live on sites within a larger residential development scheme.

¹³ PPG ID: 67-003-20190722

¹⁴ Paragraph 14.52 of the EHDNA

35. The PPG¹⁵ sets out how local authorities can increase the number of planning permissions which are suitable for self and custom build housing. These include supporting neighbourhood planning groups to include sites in their plans, effective joint working, using Council owned land and working with Home England. The HBF considers that alternative policy mechanisms could be used to ensure a reliable and sufficient provision of self & custom build opportunities across the Borough including allocation of small and medium scale sites specifically for self & custom build housing and permitting self & custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.
36. The setting of residential density standards should be undertaken in accordance with the NPPF¹⁶ where policies should be set to optimise the use of land. The flexibility provided by this policy in relation to certain considerations is noted, this will allow developers to react to some site-specific issues. However, further amendments could be made to create greater flexibility to allow developers to take account of the evidence in relation to market aspirations, deliverability and viability and accessibility.
37. The Council will also need to consider its approach to density in relation to other policies in the plan. Policies such as open space provision, biodiversity net gain, cycle and bin storage, housing mix, residential space standards, accessible and adaptable dwellings, energy efficiency and parking provision will all impact upon the density which can be delivered upon a site.

Site Allocation Policies

38. 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 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.
39. The Plan's policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver Selby'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. The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites and to provide flexibility and choice within the market. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.
40. 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. Housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range

¹⁵ ID: 57-025-20210508

¹⁶ Paragraph 125

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. 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.

41. The Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements.

Delivery, Monitoring and Review

42. The monitoring framework sets out the monitoring indicator along with the relevant policies, the data source and where it will be reported. However, the indicators do not have any targets or actions associated with them, so it is not exactly clear how the indicators will be monitored and how it will be determined if any action needs to be taken to address issues with the delivery of the plan or what those actions may be. The HBF recommends that the Council amend the Monitoring Framework to include more details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.

Future Engagement

43. 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.
44. 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