

Sent by email to: localplan@easthants.gov.uk

04/03/2024

Dear Sir/Madam

East Hampshire Local Plan

1. Thank you for consulting the Home Builders Federation (HBF) on the East Hampshire Local Plan Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Policy S1: Spatial Strategy

2. This policy sets out he the Council will over the plan period 2021 to 2040 make provision for the delivery of least 9,082 new homes the equivalent of 478 dwellings per annum (dpa). The housing requirement is based on the standard method but reflects the fact that a significant proportion of East Hampshire is covered by the South Downs National Park Authority (SDNPA) and as such is not the planning authority for that area. The Council estimate that the level of need in the area covered by National Park to be 114 dpa. The HBF appreciate that is difficult to assess housing needs areas such as national parks given that they do not follow boundaries on which population estimates are produced. The assessment produced by the Council appears logical and as such we do not at this stage seek to challenge the assumption made. However, we would challenge the level of unmet need that may arise from within the national park.
3. The Council state in paragraph 3.9 that in order to estimate the level of unmet needs arising in the national park the Council have based their approach on the assumption that 100 dpa will be delivered in the national park as per existing agreements. However, this does not recognise that existing agreements are only to 2028 and as such there are no homes planned

with the national park in East Hampshire for the final 12 years of the plan. It cannot be assumed that the 100 dpa will continue given that national park status is a significant constraint on development the Council should expect unmet needs arising within the SDNPA to be substantially higher than 14 dpa.

4. The SDNPA are currently undertaking a review of their local plan and the Council will need to work close with them to establish how many homes can be delivered in the area of East Hampshire covered by the national parks. Once the level of delivery has been broadly established EHDC will need to ensure, in line with paragraphs 11 and 61 of the NPPF, that there is sufficient supply elsewhere in East Hampshire to address the unmet needs of the national park. In addition to the unmet needs in the National Park the Council also note that there is a substantial shortfall in housing supply to meet needs across the Partnership for South Hampshire of 12,000 homes to 2036.
5. However, no assumptions have been made as to level of unmet needs in other areas and no consideration, aside from a further 14 dpa in response to the unmet needs in the National Park, is given in this plan to increasing delivery in order to accommodate unmet needs now or in future. The Council suggest at paragraph 3.11 that any homes surplus to the identified requirements could be attributed to any future identified unmet needs. Such an approach is not considered to be sound. Where unmet needs have been identified the council must make a commitment to delivering these homes and include them within the local plan housing requirements to ensure that they are planned for and delivered. Any surplus identified by the council in excess of their own requirement is necessary to ensure they meet their own housing needs and takes into account any delays in the delivery of the sites allocated.
6. Following this consultation the Council must consider strategies that could meet the unmet needs arising within the national park and its neighbouring in the PfSH area. Where the Council can support other areas, this must be included in the Council's housing requirement and there must be a sufficient buffer between this requirement and overall supply to ensure the housing requirement is deliverable over the plan period.

Plan period.

7. The proposed a plan period is 2021 to 2040 which will require the plan to be adopted by the end of 2025 to ensure that the plan looks forward for a minimum of 15 years as required by

paragraph 22 of the NPPF. The Council expect to consult on a draft plan in July of this year and submit the plan in December 2025. Whilst this plan is comprehensive for a regulation 18 consultation it still seems ambitious for the Council to properly take into account the comments made and ensure any matters relating to the duty to cooperate are addressed prior to the regulation 19 consultation in July. In our experience it would seem highly unlikely that the plan will be submitted, examined, and adopted in less than 12 months. The HBF would therefore recommend that the plan is extended by at least a year to ensure it is consistent with national policy. However, the council may wish to extend this further should it not expect to meet the deadlines set out in the LDS.

Housing Supply

8. With regard to meeting the housing requirement the Council identify later on in the plan that the Council expect to deliver a further 3,500 new homes in addition to the supply already identified from completions, commitments, and windfalls. Based on the Housing Trajectory in Appendix C is a total supply of around 9,668 homes over the plan period and result in a buffer between needs and supply of just over 6%. This is insufficient if the Council are to ensure that housing needs are met in full across and that the plan is deliverable across the plan period. This is a point recognised later on in the plan with council noting at paragraph 9.18 that further allocation is required in order to ensure a buffer of between 10 and 15% between the housing requirement and the future supply of new homes.
9. As to where the additional supply should come from the HBF does not promote sites or advocate for specific sites on behalf of others. However, one key course of supply should be smaller sites of less than 1 hectare. On the basis of paragraph 70 of the NPPF, the Council need to ensure at least 10% of homes come forward on such sites – in the case of EHDC this is around 900 homes across the plan period.
10. In meeting this requirement the Council will have to ensure that these are identified as an allocation in the local plan or in the Brownfield Register and does not include small site windfalls as contributing to the 10% requirement. Whilst it will be important to promote more small sites to come forward over the plan period as windfall, as mentioned in part d of paragraph 70 of the NPPF, the HBF considers this to be distinct from the 10% requirement set out in part a of paragraph 70 of the NPPF. Further clarification that the 10% should not include windfall development is in the glossary where windfall is defined as “Sites not specifically identified in the development plan”.

11. It is important to recognise that the allocation of small sites is a priority for the Government and stems from the Government's desire to support small house builders by ensuring that they benefit from having their sites identified for development either through the local plan or brownfield register. The effect of an allocation is to take some of the risk out of that development and provide greater certainty that those sites come forward. This in turn will allow the SME sector to grow, deliver homes that will increase the diversity of the new homes that are available as well as bring those homes forward earlier in the plan period.

12. The Council should also recognise that allocating small sites and supporting SME house builders not only ensures a stronger supply in the short term but also improves the diversity of choice within local housing markets, support local and regional supply chains and are often pivotal in bring forward innovation and supporting jobs growth locally, with 1 in 5 of the SME work force comprising of apprentices. A failure to allocate small sites will contribute to the continued decline in small and medium sized house builders. Recent research by the HBF has found that there are 85% fewer small house builders today than there was 20 years ago and that of a survey of 202 SME house builders 87% said they were considering winding up there residential activities in the next three years. Whilst this decline is due to a range of factors more allocations of small sites would ease the burden on many SME developers and provide more certainty that there scheme will be permitted, allowing them to secure the necessary finance that is often unavailable to SMEs until permission is granted.

13. The Council should also consider whether opportunities arise within smaller settlements given that the focus of much of the growth in this local plan is on the tier 1 and 2 settlements. There are some settlements within tier 3 for example which were previously considered to be tier 2 settlement and could accommodate more growth. For example, the Council demoted Four Marks from a Tier 2 settlement down to a Tier 3 settlement seemingly on the basis that it is relatively linear form means that peripheral areas fall beyond new calculated walking and cycling zones. However, the settlement still has good services and could accommodate further growth, indeed additional growth would help to ensure that those services that are currently there are sustainable in the long term. This will be a similar situation across the tier 3 settlements, and they shod not be dismissed in the search for additional sites.

Policy CLIM1: Tackling the Climate Emergency.

14. Sections 1.1 and 1.2 of CLIM1 are not policies 1.1 is merely a statement and 1.2 just signposts to other policies and does not provide any specific direction to decision maker or applicant. Rather than include these as policies we would suggest it would be more appropriate to set this out in the supporting text. Whilst section 1.3 provides some direction in reality it is merely repeating requirements that are set out elsewhere and as such offers no additionality with regard to decision making. The only element that provides an actual policy is section 1.4 which establishes what development should submit a sustainability statement.

CLIM2: Net-Zero Carbon Development: Operational Carbon

15. Parts b, c and d of this policy would require all new development to be net zero through a combination of removing fossil fuel energy use on site, setting energy use standards for all new dwellings of 35kwh/m²/year and space heating demand of less than 15kwh/m²/year, requiring the generation of renewable energy to meet energy demand and use offsetting where for any residual energy demand that cannot be met through onsite renewable energy. The Council will require applicants to confirm a metering, monitoring, and reporting strategy as part of their detailed planning application.
16. Whilst the HBF would agree with the Council that there is a need to act to reduce carbon emissions we would disagree that this needs to be undertaken through the local plan given that there is already a national approach, the Future Homes Standard (FHS), being taken forward to achieve the same goal. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approach across the county in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensure that improvements to building standards are actually deliverable from the point at which they are introduced.
17. However, if the Council chooses to go beyond current or future standards it must be done in a way that is consistent with national policy and robustly assesses its consequences and give consideration as to how the requirements of the proposed amendments to CE2 are consistent with the written ministerial statement (WMS) published on the 13th of December 2023. In this statement the housing minister notes that "*Compared to varied local standards*

nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes” and that local standards can “add further costs to building new homes by adding complexity and undermining economies of scale”. The 2023 WMS goes on to state that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale that ensures:

- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.
- The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).

18. Turning to the first bullet point, the Council will need to ensure the costs and deliverability of this policy and policy H5 are fully and robustly tested. Whilst the Council have undertaken some cost analysis in their net zero carbon study, we are concerned that these do not reflect the potential cost to the developer. This evidence would suggest that the cost of meeting these for a semi-detached house for example would be in the region of 5%. This is lower than some of the costs for similar standards set out in work by the Future Homes Hub (FHH) to support and inform the implementation of the Future Homes Standard, the findings of which are set out in “Ready for Zero”. This study tests a number of archetypes against a range of specifications from the current standards set out in the 2021 Building Regulations through to standards that will achieve similar standards to those proposed by the Council.
19. The various specifications and costs considered are summarised in Figure 8 of this report and indicates that in order to deliver standards above the FHS on a three bedroomed end of terrace house (specifications CS3, CS4 and CS5 in the FHH report) would be around a 15% to 20% increase in per unit costs compared to the 2021 Building Regulations. Whilst the specifications and assessment methodology may not be directly comparable to those being proposed by the Council there is a significant difference in the costs set out above and those in the Council’s viability evidence at between £7,500 per unit above the 2013 Building Regulations. It will be necessary for the Council to include higher costs in relation to this policy in the viability evidence if it is to consider this policy to be deliverable.
20. Whilst we would not disagree with the Council's evidence which suggests that the proposed standards are technically feasible the HBF are concerned as to the impact these

requirements will have on the rates at which sites can deliver new homes on all types of sites. Given that the standards proposed in CC2 are higher than those proposed by Government in the Future Homes Standard, which is expected to be introduced in 2025, they will likely require higher levels of fabric efficiency which will require new skills and materials that may not be readily available, and which could slow delivery the short to medium term as supply chains are developed. It has been recognised by the FHH that to deliver higher standards will require phased transitional arrangements would be needed to steadily build up the skills and ensure quality. The FHH also notes in its report Ready for Zero that even if a short transition period between current standards and those similar to the Council are proposing that this would "... create a high risk of quality problems, inflated costs and, potentially, stalled build programmes." As such consideration will need to be given as to the delivery rates of development in the early years of the plan period with fewer homes potentially coming forward in this period as these much higher standards will take time to embed.

21. Moving to the second bullet point, the approach proposed by the Council based on energy use is inconsistent with the approach set out in the WMS and as such is unsound. It should be noted that the Government have considered whether it was appropriate to use a delivered energy metric such as the one being proposed by the Council and have concluded that these do not offer any additional benefits to those being taken forward by Government. Therefore, if the Council are to require standards above those set out in building regulations they must be expressed as a percentage of the target emission rate.

22. The Council state in paragraph 4.22 that developers will need to use methodologies for assessing the energy performance of new homes that are "... *proven to be accurately predict a building's energy performance*" and then refer to Passivhaus Planning Package as an example of an acceptable tool in foot note 7. The HBF consider this approach to be inconsistent with the WMS which requires policies, and by extension the assessment of performance against those policies to be based on SAP. This provides consistency in the assessment frameworks for both planning policies and building regulations and ensures there is not a proliferation of assessment frameworks used that adds to the complexity for both applicant and decision maker. This clarification of national policy should be reflected in the local plan and the requirements to be included in the Sustainability Statement.

CLIM3: Net Zero Carbon Development: Embodied Carbon

23. This policy requires residential development of 10 or more homes or more to calculate embodied carbon emissions and demonstrate actions being taken to reduce these. Whilst the HBF recognises that there is a need to reduce embodied carbon in development it is not evident how a decision maker would determine what a reasonable baseline is with regard to embodied or how much reduction is required. Would this level of embodied carbon then be conditioned and if certain materials are no longer and have to be sourced from elsewhere, increasing the embodied carbon compared to original estimates, would this then require an application to be made to amend the condition. Seeking to maintain a specific level of embodied carbon from the estimates made in a planning permission could be impossible without significantly delaying the delivery of new homes. Therefore, the HBF consider section 3.2 of the policy to be ineffective and should be deleted or at the very least amended to state that developments of 10 or more homes should demonstrate the actions they have taken to reduce embodied carbon.

NBE2: Biodiversity, Geodiversity and Nature Conservation and NEB3: Biodiversity Net Gain

24. Section 2.1c of NEB sets out the statutory requirement for development to deliver a 10% net gain in biodiversity. The policy states that net gain should be delivered first and foremost onsite with offsite offsetting when required being delivered in a way that support agreed strategic nature recovery initiatives. The Council have then repeated this requirement in NEB3 but providing more detail as to the implementation of BNG.

25. Firstly, it is not necessary to repeat the need for development to achieve a 10% net gain and how this should be assessed and delivered. The HBF would suggest that bullet point 2c deleted from NEB2 as it is unnecessary repetition which is inconsistent with paragraph 16 of the NPPF. The policy broadly sets out what is required of development in relation to the statutory requirements. However, the HBF are concerned that part d does not give sufficient recognition to the fact that there is a hierarchy with regard to where BNG can be delivered that where it is not possible to deliver BNG locally then it can be offset anywhere in the country.

26. It is important to remember that developers are already encouraged to deliver as much gain on site or in the borough through the metric which increases the net gain required where

deliver offsite is outside of Borough and as such will increase the cost of delivering net gains. The HBF would therefore question whether it is necessary for the Council to state a preference within policy as to where gains should be delivered. However, if a preference is stated it must be recognised that:

- delivery of BNG in the relevant National Character Area (NCA) is considered within the metric to be the equivalent of delivering net gains locally. As such delivering offsite in the NCA but outside of the Borough should be recognised in the policy and given equal weight to local delivery.
- That offsite delivery outside of the Borough or NCA is acceptable if no capacity is available locally.
- That as a final resort development will be able to use national credits.

27. The Council also note in paragraph 5.26 that planning conditions or obligations may be used to ensure that a planning permission provides for works that will measurably increase biodiversity. These are not the only approaches that can be taken with developers able to enter into a conservation covenant with a responsible body.

NBE8 Water Quality, Supply and Efficiency.

28. The HBF do not consider part 8.3 of the policy to necessary and should be deleted. Paragraph 194 of the NPPF states that: *“The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively.”* As such there is no need to reference the need for development to reference other environmental standards for waste water conveyance and treatment. These are addressed through other controls and regimes and as such are not part of the decision as to whether a development is an acceptable use of land.

29. Part 8.4 will require new development to achieve a water efficiency of no more than 95 litres per person per day (l/p/d). This is inconsistent with national policy on optional technical standards which allows LPAs to set an improved standard of 110 l/p/d where justified. The HBF do not contest the need for the lower water standard of 110 l/p/d to be applied in East Hampshire but to go beyond this is clearly inconsistent with what is allowed in national policy and should be amended accordingly.

NBE9 Water Quality Impact on the Solent International Sites

30. This policy sets out that new development resulting in a net gain in residential units will be permitted where an application can demonstrate the development nutrient neutral or has approved on-site or offsite mitigation measures which result in the proposal becoming nutrient neutral. Whilst the HBF recognises the need for such policies in order to overcome the advice given by Natural England's we contend that the significance of the harm created by new home is minimal and that the Council as the competent authority is able to set aside this advice.
31. Research commissioned by the HBF¹ shows that the occupancy of new homes accounts for just 0.29% of total nitrogen emissions each year. The research also puts nutrient output from residential properties in the context of agricultural activities which is responsible for around 70% of the nitrogen that finds its ways into rivers and streams. The research found that each dairy cow in affected areas produces Nitrogen discharges equivalent to 29 homes while each sheep is responsible for the same amount of Nitrogen as three family homes. The report shows that agriculture accounts for 70% of the nitrogen released into our rivers, with the existing housing/population contributing 30% through discharges into the sewerage system with new housing would contribute 0.29% of this figure.
32. Housing makes such a negligible contribution to the pollution in our rivers we would question whether new housing is having a significant effect on the relevant protected habitats especially when compared to the impact farming practices clearly have with regard to the declining quality of our rivers. However, if the policy is to be retained, the HBF disagrees the Council's use of a 2.4 people as the average household size in new homes within the nutrient budget calculator. Other areas, for example the affected LPAs in Norfolk, have undertaken research that shows the net additional population new household is much smaller than the 2.4 average used by the Council. This is because not all new homes are occupied by people moving to the area. Some will already be living in the area and are purely creating new households not new residents in the area. Research commissioned by the HBF² from Lichfield's shows that the net additional average household size in the catchment areas impacting on the Solent is just 1.67. This is significantly lower and should be used in the calculator and referenced in the local plan to confirm it as the level of additional growth per household adopted by the Council.

¹ <https://www.hbf.co.uk/news/nutrient-pollution-review/>

² <https://www.hbf.co.uk/news/nutrient-neutrality-lichfields-report-unblocking-homebuilding/>

DES1: Well-designed Places

33. Part G requires development to take into account how the delivery of services may change over time. It is not clear to the HBF how a developer or decision maker can accurately consider this policy. It is not known how service delivery may change over time with any assessment on behalf of the developer or decision maker being guess work making the policy ineffective. The phrase should be deleted.

HWC1: Health and Wellbeing of Communities

34. Part 1.2 of this policy requires all residential development of 50 homes or more to undertake a Health Impact Assessment (HIA). Whilst the HBF would agree that they are an essential part of plan making to ensure the Council understand the health outcomes it is seeking to achieve and creates a plan that seeks to deliver these. This should be achieved through the preparation of a whole plan HIA which will inform the Council that the policies it contains address the key health outcomes for the area. As the plan and the policies, it contains has been prepared to address the key health issues it is therefore unnecessary for future development proposals that accord with this plan to undertake a separate HIA. If a development meets the policies in the plan, then it is by default addressing the health outcomes already identified by the Council. An HIA as part of the application would merely be repetition of the work the council has already undertaken. The only circumstance where an HIA may be appropriate would be for a larger unallocated site where the impacts may not have been fully considered by the council as part of the plan wide HIA.

DGC1 Infrastructure

35. Part 1.2 of this policy requires development proposals to consider all the infrastructure implications of a scheme not just those on site or its immediate vicinity. This is general statements masks the fact that the implementation of this policy could go beyond the requirements of what a planning authority can consider with regard to some infrastructure when making land use planning decisions. This concern is confirmed in paragraph 8.18 which states that developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both onsite off site to site to serve the development.

36. The HBF do not consider this to be necessary as the capacity of the sewage network are not a land use planning matter for consideration on an application by application basis as Water companies are subject to statutory duties under S37 and 94 of the Water Industry Act 1991 (WIA 1991). Section 37 of the Act, set out below, imposes a statutory duty on all water companies to provide and maintain adequate infrastructure and potable water supplies.

“S37 General duty to maintain water supply system etc.

(1) It shall be the duty of every water undertaker to develop and maintain an efficient and economical system of water supply within its area and to ensure that all such arrangements have been made—

(a) for providing supplies of water to premises in that area and for making such supplies available to persons who demand them; and

(b) for maintaining, improving, and extending the water undertaker’s water mains and other pipes, as are necessary for securing that the undertaker is and continues to be able to meet its obligations under this Part.

(2) The duty of a water undertaker under this section shall be enforceable under section 18 above—

(a) by the Secretary of State; or

(b) with the consent of or in accordance with a general authorisation given by the Secretary of State, by the Director.”

37. Section 106 of the WIA 1991 confers a power to connect to a public sewer. Section 106(1) states that the owner of any premises or the owner of any private sewer which drains premises, shall be entitled to have its drains or sewer communicate with the public sewer of any sewerage undertaker and therefore discharge foul water and surface water from those premises or that private sewer.

38. Specifically, in relation to wastewater, the Supreme Court considered this matter in 2009 – see *Barratt versus Welsh Water* [2009] UKSC 13. Paragraph 23 of the decision is salient. Given its importance in the context of wastewater it is recited in full below:

“The right to connect to a public sewer afforded by section 106 of the 1991 Act and its predecessors has been described as an “absolute right”. The sewerage undertaker cannot refuse to permit the connection on the ground that the additional discharge into the system will overload it. The burden of dealing with

the consequences of this additional discharge falls directly upon the undertaker and the consequent expense is shared by all who pay sewerage charges to the undertaker. Thus, in Ainley v Kirkheaton Local Board (1891) 60 LJ (Ch) 734 Stirling J held that the exercise of the right of an owner of property to discharge into a public sewer conferred by section 21 of the 1875 Act could not be prevented by the local authority on the ground that the discharge was creating a nuisance. It was for the local authority to ensure that what was discharged into their sewer was freed from all foul matter before it flowed out into any natural watercourse.”

39. Consequently, it is inappropriate to include a policy in the local plan requiring a housebuilder, or other applicants for development, to assess the capacity or otherwise of the water company to provide water supply and wastewater connections as they are an attempt to get applicants to do things for which they are not legally responsible. This policy must be clear that for services where there is a statutory requirement for the provision of these services then this is not a matter for the decisionmaker at the point of application.
40. Rather it is the responsibility of water companies, working with local authorities and the Environment Agency, to plan for the future demand for water services relating to the development requirements proposed in local plans, not applicants. If the water company is unable to supply those needs, this needs to be disclosed in the Water Resource Management Plan (WRMP). If unforeseen events occur after the WRMP is adopted, meaning that the water company is now unable to provide the water services required, then the local authority must reflect those problems in its local plan. HBF recognises that this could represent a significant barrier to the delivery of the local plan. It might even mean that the development requirements cannot be delivered, either in part or in their entirety.

DCG2: Sustainable Transport

41. Part 2.1 of this policy defines suitable locations are those that are in an accessible distance to enable local living. However, no guidance is provided as to what an accessible distance is and therefore how a developer or decision maker would consider this policy in relation to a development. The Council should avoid such general terms in relation to accessibility and provide clearer guidance as to what is considered to be an accessible distance.

H1: Housing Strategy

42. The HBF's comments on housing needs and supply are set out in response to policy S1 and apply to much of what is set out in H1 and its supporting text. As set out in those comments the HBF are concerned that the Council has not taken full account of the unmet needs that will arise in the parts of EHDC in the SDNPA or in other areas of the PfSH area. In addition, the buffer in supply of around 6% is too small to provide a sufficient confidence that needs can be met over the plan period. As the council note in paragraph 9.18 further sites should be allocated to ensure a buffer of between 10-15%.

H2: Housing Mix and Type

43. Par 2.4 states that a proportion of affordable homes may be required to provide wheelchair accessible homes where there is evidence that this is needed locally. This approach is not unreasonable however the HBF would suggest that following where evidenced by local need the council insert "*and is viable and feasible*". This would ensure that there is sufficient flexibility in the policy to take account of those situations where it is not viable, or it is physically impractical for such a home to be built to part M4(3). We note that the Council's viability study sets the cost of delivering a home to part M4(3) at £115 per sqm. However, the study also fails to recognise the difference between part M4(3)a and M4(3)b. The cost of delivering the later is significantly higher. As to how much the cost of these should be the HBF have seen similar studies which estimate the cost to be between £13,000 and £30,000 per dwelling depending on which standard is used.

H3: Affordable Housing

44. The HBF has concerns that the Council have not tested the full costs arising from this local plan. In particular the cost of delivering net zero carbon homes is far too low and could in combination with the other policies in the plan make development unviable. The Council will need to produce an updated viability assessment to fully consider the cost of delivering new homes under this local plan.

H5: Specialist Housing

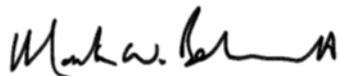
45. The HBF would consider such an approach to be ineffective in meeting the specialist accommodation needs for older people across Basingstoke. The most effective approach

to meeting the housing needs of older people is for the Council to allocate sites within the local plan for retirement housing and other specialist accommodation for older people. Given the competition for sustainably located sites will be high, allocation is the most effective way in ensuring such development will come forward over the plan period. The HBF would also recommend that the Council include within the policy the amount of specialist accommodation required to meet the needs of different groups within EHDC. Whilst this is not specifically required by national policy the HBF consider it necessary in order to be make the policy effective. If no indication is provided as to what is needed, then it is not possible for decision makers to effectively apply this policy or for the council to monitor it effectiveness.

Future engagement

46. I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry if that would helpful. The HBF would like to be kept informed of the progress and adoption of the Local Plan. Please use the contact details provided below for future correspondence.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

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