

Sent by email to: planning.policy@westsuffolk.gov.uk

11/03/2024

Dear Sir/ Madam

West Suffolk Local Plan

1. Thank you for consulting the Home Builders Federation (HBF) on the West Suffolk 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.

SP1: The climate and environment emergency and sustainable development

Policy is unsound as it lacks the necessary clarity required by paragraph 16 of the NPPF and in inconsistent with national policy.

2. This policy is merely a vague repetition of what is to follow, and it is unclear as to what the council is seeking to achieve with this policy, other than to signpost as to what is to come later in the plan. The policy references elements of other strategic policies that are not considered in those more detailed policies proceeding SP1. For example, the policy references the need for development to take into account the provision, integration, and connection blue and green infrastructure which are then not covered in subsequent policies relating to the strategic policy, but which are referenced again in SP4: Green Infrastructure. The HBF would suggest that the policy needs to be rewritten to provide clarity and direction for the decision maker as to how they are meant to respond to each of these elements. If it is a policy that provides an overview and merely signposts to other policies, then at the very least it should do this by providing references.

3. In addition, the HBF would disagree with elements of the policy that relate to matters set out in more detail elsewhere. Firstly, the HBF would disagree that the development should be placing requirement on minimising energy consumption. The Government have set their focus for reducing carbon emissions from new buildings rather than reducing energy use. Whilst reducing energy use is important it should not be the focus of new development to minimise energy use. In addition, the policy requires higher water efficiency standard to be met which are inconsistent with the approach set out by Government in PPG. We will return to both these matters below.

LP1: Sustainable design and construction

The policy is unsound as it is unjustified, inconsistent with national policy and ineffective.

4. This policy places a variety of requirements on the design of new buildings. The HBF's concerns relate to the proposals relating to parts f and g on design and building, and the requirements relating to BREEAM.
5. 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 standards 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. Indeed, in a Written Ministerial Statement from the Minister of State for Housing published on the 13th of December the Government clarified the importance of its commitment to this issue and the need for a consistent approach to building standard in relation to carbon emissions stating:

“The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government’s commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings

regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale.”

6. Whilst aspects of this policy relating to the orientation of buildings etc. are important matters for consideration as to the way homes are delivered the HBF consider it unnecessary for the local plan to require development to use a fabric first approach to meeting current standards or indeed higher standards being proposed in the Future Homes Standard. Indeed, the Government consider this issue in the latest consultation and conclude that increasing fabric requirements in the 2021 Building Regulations the potential to improve the fabric efficiency standards in set out in the current building regulations as these provide a good basis for the Future Homes Standard and did not deliver significant additional benefits to the home owner and that other interventions offer a more cost effective way of decreasing carbon.
7. It is also not clear within the policy what carbon standard the council are referring to? Are these the standards set out in the current building regulations or those being proposed in the Future Homes Standard, or some other target? Without any reference neither the decision maker or applicant would know how to respond to this policy making the policy both ineffective and inconsistent with national policy. Similarly, the policy mentions the need to go above building regulations in the with regard to energy efficiency standard prior to the introduction of the Future Homes Standard but then does not state by how much the developer should go beyond current standard prior to the introduction of the Future Home Standard.
8. With regard to costs the viability evidence suggests a 5% increase in cost. However, without any clarity as to what is expected of housebuilders from this policy the HBF are doubtful that a robust assessment of the viability and its impact on housing supply has been undertaken by the council. Without any reasonable justification for the council's vague expectations in this policy the reference to fabric standards, carbon standards and delivering energy efficiency standards above building regulations should be deleted.
9. The Council then propose that developments of over 100 units will need to complete a BREEAM communities' assessment excellent standard. The HBF assumes that it is expected that development will meet the excellent standard, but it is not clear from the policy that this is the case. The Council then go on to reference the Homes Quality Mark in

paragraph 4.1.17 of the supporting text which would appear to be different to the BREEAM standard mentioned in the policy itself as it uses a star rating system which is not referred to in the policy. The Council must be clear and consistent in its policy as to what its expectations are and without clarity the policy is unsound and must be deleted.

10. However, even if the policy was clear on this issue the HBF does not consider it to be sound. No evidence is provided as to whether the standard being proposed is consistent with building regulations and national planning policy, how it will impact on delivery or whether the cost of achieving this will be higher than the 5% included in the viability assessment in relation to the whole of this policy. Given that the evidence published by the Future Homes Hub suggests costs of meeting the Future Homes Standard could be a 5% uplift on Part L 2021, then the cost included in the viability assessment relating to the higher BREEAM standard would appear to be too low. It should also be noted that the BCIS builds costs will largely be based on homes built to Part L 2013 and as such the cost of meeting the Future Homes Standard will be significantly higher than the 3.5% increase suggested by the council.
11. Therefore, the HBF considers the requirement for developments of 100 units or more to meet the BREEAM excellent to be unsound as it is both unjustified and inconsistent with national policy.

LP2: Promoting energy and water efficiency in new homes.

The policy is unsound as it is ineffective.

12. It is wholly inappropriate for the council to stray into the marketing aspects of any development and the different options that might be available to a purchaser with regard to energy or water efficiency. With regards energy efficiency many of the options that might be available will be delivered by building regulations and as such are not optional and as such cannot be sold as extras. A developer who builds above these standards will most likely want to use this within their marketing but again it is unlikely that many of these will be optional extras but part of the fabric of those houses that are not easily amended once. They will form part of the general marketing of those homes but as to the degree they will be marketed that is for the developer. If a developer wants to provide alternatives and market these that is up to them, if they do not then that is also their choice, not the Council's.

13. With regard to water efficiency to go beyond the national standard currently set out will again likely require more substantial changes to building design and will not be optional extras. As such the policy is not only inappropriate it is also unnecessary and ineffective. In some cases, it could even have the opposite effect to the one expected by the Council. For example, more water efficient homes mean smaller baths and lower water pressure, which will, alongside the environmental concerns, need to be fully explained to the purchaser.
14. Finally, we are also concerned that should these not be adopted by home owners it is unclear as to how the council will react. It must be recognised that whilst developers may promote such measures it is ultimately a consumer choice as to whether they are purchased. In conclusion, the HBF consider the policy to be unjustified and ineffective and should be deleted.

LP3: Electric vehicle charging points in new developments.

The policy is unsound as it is inconsistent with national policy.

15. The Council should delete the requirements relating to the delivery of charging facilities for electric vehicles set out in the first paragraph. These are covered by part S of the Building Regulations and require all parking spaces associated with a new home to be provide with an electric vehicle charging point. As such there is no need for separate policy in the local plan. The policy is also inconsistent with national policy as it fails to recognise that Part S (2021) states at paragraph 1.4 that these should only be provide where the cost is less than £3,600 per space and it is not in a covered car park.

LP6: Water quality and resources

The policy is unsound as it has not been fully justified.

16. This policy will require new development to achieve a water efficiency of no more than 100 litres per person per day (l/p/d). The HBF recognise that the Government have stated that Council's should work with the Environment Agency with regard to agreeing tighter standards, but it will be important to recognise that this will have negative consequences for those buying new homes that will need to be taken into account by the Council and that any standard set is realistic and deliverable. The Council will need to show that they have engaged with the development industry locally and provide evidence that level of provision

can be reasonable delivered without significant impact on quality of a home owners experience. Should there be a negative experience amongst homeowners there is strong likelihood that fixture included to reduce water use will be removed and replaced. If this policy is to be considered effective the level of water efficiency needs to be appropriate to ensure that this will be maintained over the lifetime of the property.

LP9: Designing for Health and Wellbeing and the impacts of new development.

The requirement for HIAs is unsound as it is ineffective and unjustified.

17. The third paragraph of LP9 requires all residential development of 100 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.
18. 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. Given that development will already need to set out how it has addressed the policies in this plan how it has met the elements of SP2 it seems wholly unnecessary to require them to also undertake an HIA.

SP3: Design

Parts of SP3 are unsound as they lack the necessary clarity for decision makers as required by paragraph 16 of the NPPF.

19. Part H requires development to provide and enhance open spaces, play, leisure and cultural facilities, to provide a sense of wellbeing, community cohesion, safety and ownership. Firstly, the final element of part h should be deleted. Whilst these may be the outcomes that

council is seeking to achieve from the provision of such services, they are not elements that can be assessed as part of the decision making process and should be deleted from the policy. Secondly, the open element of the sentence should be amended to “*where appropriate providing and/or enhancing*”. This will ensure the policy is more precise and consistent with paragraph 57 of the NPPF.

20. Part I sets out the policy regarding connecting homes and communities. Whilst the principle of the policy is not challenged the reference to providing recreational space for dog walkers seems incongruous. Recreational space should be available generally and whilst this is probably the case it could be interpreted as providing specific space for dog walkers in addition to other spaces and as such is unjustified and should be deleted.

LP12 Design Codes

Parts of SP3 are unsound as they lack the necessary clarity for decision makers as required by paragraph 16 of the NPPF.

21. The third bullet point in the policy lacks clarity and could lead to the majority of sites in West Suffolk being required to include a design code. The Council need to be more specific as to the likely type of site that will require a design code to provide greater certainty to applicants and decision maker alike.

SP4 Green Infrastructure

The policy is unsound as it is unjustified.

22. This policy will require all major development on green fields sites of 50 homes or more to deliver 40% of the site as green infrastructure. This is a significant proportion of the site and will impact on the number of homes a site can deliver and the viability of development. However, the only reference we could find in the viability assessment is on page 62 and states that the cost impact is unknown. Without any evidence on the viability and deliverability of this policy it is unsound, and the 40% requirement should be removed.

SP6: Biodiversity Net Gain

The policy is unsound as it is inconsistent with national policy.

23. This policy sets out the statutory requirement for development to deliver a 10% net gain in biodiversity. The policy states that net gain should be delivered onsite with the focus for offsite on locally defined ecological networks identified in the local nature recovery strategy. 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.
24. 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, is 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.
25. With regard to the penultimate paragraph of SP6. This reads more as an element of supporting text rather than a policy. However, if its to be retained we would suggest that it is caveated with "*where possible*". As outlined above there are variety of means through which statutory net gains can be delivered where sufficient opportunities are not available locally and this needs to be fully acknowledged within this policy.

SP9 Spatial Strategy

The policy is unsound as it is inconsistent with national policy and lack the necessary clarity to be effective.

26. This policy sets out the spatial strategy for the borough including the number of homes the Council is required to deliver and the level of supply identified to meet those needs. The policy also sets out the settlement hierarchy for the area, the distribution of housing and a range of other policies over 7 pages of the local plan. Indeed, much of the policy reads more like supporting text. For example, the opening paragraph sets out the council's intentions rather than actual policy that would be of use to the decision maker and the explanation as to what each column means with regard to table setting out the component of supply is also more appropriate as supporting text. Similarly references to the horse racing industry and the natural, historic and built environment are descriptive rather than actual policy.
27. The structure of the policy therefore makes it difficult for both applicant and user to decipher what the intentions of this policy are, and we would suggest that much of what is included could be set out in supporting text leaving the policy to set out the scale of development expected, where this will be delivered and how it will be managed over the plan period. The HBF consider it necessary for the whole policy to be rewritten removing much of the text and placing this in the supporting explanation. Without a major rewrite the policy cannot be considered to have the clarity required by paragraph 16 of the NPPF.
28. With regard to the housing requirement the Council state that this is 13,702 dwellings over a plan period of 2023/24 to 2039/40 which is in line with the Government's assessment of housing needs. The HBF is also concerned that the council has not properly considered whether housing need could be higher, and these are outlined in our comments on SP10.

Settlement hierarchy

29. The Council have included the settlement hierarchy in the policy and in the table following the hierarchy the level of supply expected to come forward in each settlement type. Whilst the HBF is not seeking to challenge the hierarchy it is notable from this is that just 6% of total supply is expected to come forward in local service centres and type A villages. The HBF would suggest that there may be potential within these settlements to identify small sites that will ultimately help the Council meet its requirements that 10% of homes come forward on identified small sites.
30. The Council have also placed limits on the size of development that should come forward in each settlement type. This is set out in the supporting text of the Settlement types and approach to growth section, but the HBF could not find any evidence to justify the

development sizes being proposed by the council in relation to each settlement type. Whilst the scale of development needs to be proportionate to the development, we do not consider it appropriate to place arbitrary limits that will inevitably be used to as a reason to oppose suitable and sustainable developments that go beyond these levels.

SP10 Housing needs

The policy is unsound as it is inconsistent with national policy and lack the necessary clarity to be effective.

31. This policy repeats the housing requirement and level of supply that is included in SP9 and as such our comments on SP9 are also relevant to SP10. Whilst the repetition is not necessarily harmful it is unnecessary and is indicative of a plan with many policies that lack the clarity expected by national policy. There is clearly some scope to refine the wording in both SP9 and SP10 in a way that seeks to avoid repetition and provides concise and usable policies that will help both applicants and decision makers.

Housing needs

32. With regard to the housing requirement the Council state that this is 13,702 dwellings over a plan period of 2023/24 to 2039/40 which is in line with the Government's assessment of housing needs. The HBF agrees with the council that this is the minimum number of homes that the Council should be planning for but what is not clear from the supporting evidence is if the council has considered whether it should be planning for a higher level of housing need. Paragraph 61 of the NPPF states that this is an advisory starting point and as such there will be circumstances where housing needs are higher than those arrived at using the standard method. Some of these circumstances are described in paragraph 2a-010 of Planning Practice Guidance and it is essential that the Council can provide evidence to show that they have considered these, or other relevant scenarios, where housing need may well be above what is proposed in the local plan. In particular the council will need to consider whether the level of economic growth coming forward in and around Cambridge and the infrastructure to support that growth will impact on economic growth in West Suffolk and the number of homes needed to support that growth.

33. The Council has identified an annual need for affordable housing of 550 dpa. Given that the PPG 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. Therefore, the HBF considers that the Council should also be taking this affordable housing requirement into consideration as part of their housing requirement.

Housing supply

34. The policy states that the Council have identified sufficient land to deliver 15,486 homes over the plan period. This includes nearly 2,000 homes on existing commitments on large and small sites, over 7,000 homes on allocations in the local plan with a planning permission and 1,200 homes expected to come forward as windfall. The remain homes to come forward on allocated sites total circa 5,200 dwellings. This level of supply provides a buffer of 13% between housing needs and supply. The HBF welcomes the Council's decision to plan for more homes than is required given that it is inevitable that some sites will not come forward as expected. Whilst there is no hard and fast rule as to how big buffers need to be to ensure the housing requirement is delivered the HBF considers a buffer of between 10% and 15% to be appropriate. However, larger buffers may be required where a significant proportion of supply is coming on a small number of larger sites.
35. The Housing trajectory is set out in appendix F provides the annual level of supply of the figures set out at the start of SP9. On the basis of the expected levels of supply it would appear that the council will have a five year land supply on adoption. However, our estimates suggest that this is relatively marginal at 5.16 years using the Sedgefield approach as required by PPG, should the plan be adopted in 2025/26. As such there is a risk that the Council will not be able to show a five year land supply on adoption should the expectations on delivery change prior to or during the examination of the local plan. Given that on adoption, and for the first five years of the plan period, the Council will not be required to identify and update annually its five year land supply it is essential that there is a reasonable buffer between needs and supply during this period. In particular the council should seek to ensure that there is a supply of smaller allocated sites that will come forward during this period and ensure needs are met in full.

Supply on sites of less than one hectare.

36. The Council state in this policy that the Council that sites have been identified in this plan and the brownfield register to accommodate some ten per cent of the housing requirement on sites of less than one hectare. However, the HBF could not find where is clearly set out

in the evidence base. In meeting this requirement the Council will need to ensure that these are identified does not consider 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, this is 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*".

37. 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.
38. 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 SME house builders 93% said that planning was a major barrier to SME growth. 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 their scheme will be permitted, allowing them to secure the necessary finance that is often unavailable to SMEs until permission is granted.
39. Therefore, in order for the plan to be consistent with national policy the Council should not just seek to maximise delivery from the small sites that do come forward but to actively promote these through allocations in the local plan.
40. The HBF would also suggest that more encouragement is needed in this policy, or SP9, encourage small sites to come forward. Such a policy is necessary and ensure the plan is consistent with paragraph 70(d) of the NPPF which gives great weight to small windfall sites,

particular those in within existing settlements. In order to clearly show its support small sites, to decision makers we would suggest that the policy actually recognises the importance of small sites and SME house builders in general by including a statement such as:

“In order to recognise the value of SMEs and small-scale sites, the Council will support development of unallocated or windfall small scale housing and approve applications providing they are consistent with other policies in this plan.

LP20: Affordable Housing

41. The policy requires 40% of homes on greenfield sites to be affordable with the figure reducing to 30% on brownfield sites. With regard to the 40% requirement set out in LP20 the council state that variations to the proposed level of affordable housing delivery may be necessary in order to ensure the delivery of important strategic infrastructure with the expectation that delivery will be maximised. This suggests that the Council may be pushing some development to the margins of viability with regard the cumulative impact of the policies in this local plan and the infrastructure required to support that development. This concern is further supported by the viability study which notes at paragraph 3.12.3 that in green field sites in lower value areas such as Mildenhall and Lakenheath support closer to 30% affordable housing that then 40% required by this policy.
42. This council's approach in this policy also assumes that strategic sites with important strategic infrastructure are exceptional and for applicants to prove an impact on viability. However, it is more likely that the requirement to deliver infrastructure is the norm and should be reflected positively in policy to limit the burden placed upon developers of strategic sites through the plan, as is suggested in paragraph 34 of the NPPF, rather than as negotiated as part of the development management process.
43. The HBF is concerned that the Council are pushing development to the margins of viability with the suite of policies they are proposing. Given that the Council have also underestimated some of the costs relating to energy efficiency standards and there is still significant uncertainty as to how much the council's Green Infrastructure policy will actually cost there is a strong argument for the council either reconsidering its affordable housing requirement or alternatively some of the other policies in the plan. For example, if the council were not to go beyond building regulations with regard to energy efficiency and sustainable

design as is being suggested in SP1 and LP6 the Council would ensure more scope for delivering affordable housing requirements whilst still achieving broadly the same objectives with regard to reduction in carbon emission from new homes.

44. The current local plan states that the strategic sites should deliver 30% affordable housing. Denbury Homes controls the strategic site south east of Bury and this has an Outline PP including 30% affordable homes. Any new application here would have to show 40% in line with the new Reg 19 Policy. Furthermore, it seems that the 40% becomes 40 out of every 90 homes (44.5%) because the top 10% of homes are to be self build and there isn't a self build affordable policy. Thus, on a green field site the affordable homes policy would now become 44.5%
45. Whilst the HBF welcome the flexibility included in policy in relation to larger sites that are required to deliver strategic infrastructure we would suggest that flexibility is also provided for smaller sites in order to support the SME market in West Suffolk. The HBF should also suggest that the Council emphasise their willingness to be flexible on small sites that often face more challenging viability (especially where these are being brought forward on previously developed land) and the fact that small scale delivery of affordable homes on smaller sites is sometimes not attractive to many Housing Associations. To take this into account and encourage more small sites the policy could in addition include the following or similar:

“A flexible approach will be encouraged to the delivery of Affordable Housing assessed on a site-by-site basis. Where on site provision is demonstrated through evidence to be unviable or unattractive (less than 70% Open Market Value) to recognised Registered Providers, the Council will permit alternative levels of Affordable Housing or alternative forms of tenure, including First Homes, payment in-lieu of on-site provision or another form of recognised Affordable Product as defined in the NPPF.”

46. The Council have included a review mechanism where planning permission do not meet affordable housing needs, however, in addition the council also state that on multi-phased developments affordable housing provision will be reviewed prior to each phase, seemingly even if they are policy compliant. This is unsound. Where a development is policy compliant with regard to affordable housing delivery at the point at which the position was granted, the

council should not be seeking to revisit that level of provision which will have defined the delivery of that site and its financial viability. The paragraph should be removed.

First homes

47. Policy LP20 states that “If a proposal for a site includes First Homes, they should make up 25 per cent of all affordable homes secured”. The government policy is that at least 25% of the affordable homes should be first homes and the policy should be amended to reflect this. Whilst this may seem a relatively minor amendment it provides clarity that any provision must rounded up rather than down by the council.

LP21: Housing Type and Tenure Mix

The policy is unsound as it has not been justified.

48. This policy states that all new housing will be required to meet or exceed the Nationally Described Space Standards (NDSS). The 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. PPG1 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. Whilst the Council have considered NDSS within the viability study it has not seemingly provided any evidence as to the need for such homes. This will need to be available at submission if the council are to require NDSS as part of this local plan.

49. The policy requires all homes to be built to part M4(2) and 13% of all affordable homes to be built to part M4(3) This is a relatively high proportion of homes to be wheelchair accessible. With regard to M4(2) the Council’s evidence would appear to be largely based on the fact that there is an ageing population. This is the case across the country and suggests that it is not sufficient reason for all homes to be built to M4(2). The Government are currently considering its position on making part M4(2) mandatory but until this is adopted the council will need to provide further evidence as to why M4(2) is needed on all homes.

¹ PPG ID:56-020-20150327

The Council will also need to consider the impact of this on other policies. For example, the space required with regard to parking is higher within M4(2) and can reduce the amount space available for gardens, other open spaces, and the density at which some schemes can be delivered.

50. The Council have provided some evidence in the Housing Needs of Specific Groups (HNSG) paper with regard to wheelchair accessible to support these assumptions, but it is largely based on estimates at a national level being applied to West Suffolk and from data from the 2011 census and 2012 and 2014-15 English Housing Survey. This data is now somewhat dated, and we would suggest that it is updated, and further consideration is given as to any evidence that might be available from local sources.
51. The policy will also need to recognise that there will be situations where neither part M4(2) or M4(3) will be deliverable in full either due to viability or the practical feasibility of delivering step free access on some sites.

Policy LP25 Custom and self-build

The policy is unsound as it is unjustified.

52. The Council are proposing that sites of over 100 units will be encouraged to provide at least 10% of homes as plots for self-build or custom housebuilding. Whilst the HBF recognises that the Council has a duty to provide sufficient self-build plots to meet needs, the policy is excessive given that, according to paragraph 4.4.95 of the local plan, the self-build register currently has only 178 people on it. If the Council continues with this policy, then they will need to provide the evidence to support it. The self-build register will provide a key part of this evidence, but the Council will need to ensure that it is robust and has been reviewed to ensure that those on the list are still looking to self-build and have the means to do so. The Council have provided some additional evidence showing that the demand for self-build nationally is between 7% and 10% of supply. However, such a general figure based on national assumption cannot be relied on to reflect demand in West Suffolk. Furthermore, there does not appear to be any evidence to show that those on the register want to purchase plot within estate scale development. The majority of self-builders will want a plot that is wholly separate from such development and it is unlikely that many sites will be able to facilitate this type of demand.

53. Such a blanket requirement for self-build homes on large housing sites also fails to recognise that the deliverability of self-build plots will vary from site to site. On some sites it will not be possible for the provision of self and custom build plots on new housing developments to be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site from both a practical and health and safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity.
54. Instead, the approach to self-build should focus on identifying specific sites on which self-build can be delivered rather than including it as part of other sites delivering market and affordable housing. One alternative the council could take forward is a permissive approach to small edge of settlement sites for small self and custom house building development. Such an approach would be consistent with planning practice guidance on this matter which encourages councils to work with landowners rather than place requirements on them with regard to plots for self-build and custom house building. It would not only better meet the expectations of those looking to build their own home but also ensure the Council meets the government's expectation for delivery on small sites set out in paragraph 69 of the NPPF.
55. We note that it is proposed that the policy will include a mechanism that self-build plots should return to the developer to be built out after a marketing period of 12 months. This general approach is supported by the HBF but would suggest that six months is more appropriate. If there is the demand suggested by the council, then there the need for a lengthy marketing period is unjustified.
56. At present the HBF consider the policy to be unjustified and not in proportion to the demand for self-building West Suffolk. The policy must be proportionate and relate to what is needed and not lead to a level of provision that is beyond identified needs.

General point on clarity

57. The HBF notes that none of the policies include specific paragraph/ section numbers. We would suggest that these are included to aid decision makers and applicants when referring policies in planning applications and decisions. Whilst not a matter of soundness it does support the effectiveness of the local plan and its application should it be adopted.

Conclusion

58. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in the NPPF. I can therefore confirm that the HBF would like to participate in any hearing sessions held at the examination in public on the matters raised in our representations and that we would like to be kept informed of the submission and examination of the local plan.

Yours faithfully

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

Mark Behrendt MRTPI
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