

Sent by email to: planningpolicy@testvalley.gov.uk

28/03/2024

Dear Sir/ Madam

Test Valley Local Plan – Reg 18 Part 2

1. Thank you for consulting the Home Builders Federation (HBF) on the Test Valley 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.

Plan Period.

2. The Council's Local Development Scheme notes that the Council expect to adopt the local plan in Q2 of 2026. This means that on adoption the local plan will look forward for under 15 years which is inconsistent with paragraph 22 of the NPPF which requires local plan to look ahead for a minimum of 15 years from adoption. The Council must extend the plan period by a year to ensure that on adoption the plan period is consistent with the requirements of national policy.
3. The HBF would also question whether it is necessary for the plan period to start from 2020/21, 2021/22 and 2022/23. Given that the plan will be adopted in 2026 delivery during the first three years would have little to do with the remaining plan period and as such it is unnecessary for the plan period to go back so far. With regard to development needs it is also the case that the standard method is based on the period 2024 to 2034 with the affordability ratio relating to income and house prices in 2023. This would suggest that the most appropriate start date for the plan period would be 2023/24.

4. The HBF would recommend that the current plan period is unsound as it is inconsistent with national policy and should be amended to 2023/24 to 2040/41.

Duty to co-operate.

5. The Council will need to ensure that they engage effectively with neighbouring areas with regard to housing needs. In particular the council will need to engage with its partners in the Partnership for South Hampshire (PfSH) which has identified in its latest position statement that there is a shortfall of 11,711 homes across south Hampshire with significant shortfalls in the New Forest and Eastleigh both of which border Test Valley. Together shortfalls in these two areas amount to well over 8,000 homes between 2023 and 2036. In particular the constraints faced by New Forest due to the National Park will require neighbouring authorities such as Test Valley to identify further land to help meet these needs.
6. What is also notable from the evidence set out in Table 1 of the PfSH Position Statement is that the unmet needs of Southampton are set out as zero. The reason provided is that it would be inappropriate to allocate these unmet needs to other areas as they relate solely to the 35% urban uplift. Whilst the HBF recognise that the urban uplift should be delivered in the city or urban centre to which it applies, TVDC should still consider whether it is possible for some of the uplift could be delivered in or around those areas that are adjacent or close to Southampton.

SS3: Housing requirement

7. This policy sets out the Boroughs housing needs as 550 dwellings per annum (dpa) which is a total of 11,000 homes over the proposed plan period. However, the Council must take into account any unmet needs that cannot be met in neighbouring areas when considering the number of homes to be planned for.
8. As outlined earlier in this response there are unmet needs in neighbouring areas that the council must also take into account. Whilst the Council state in paragraph 3.59 that there is no clear evidence as to unmet needs, it is evident from the PfSH position statement that there are unmet needs across south Hampshire between 2023 and 3036. Whilst it could be expected that delivery may be increased in LPAs such as Eastleigh, area such as Gosport, Havant, Portsmouth, and Southampton are constrained by their geography and borders that are drawn tight to the urban edge or in the case of the New Forest they are constrained by

the National Park. It is therefore essential that the Council start planning now to increase the supply of homes to address some of these needs.

9. The Council do not consider it to be justified to increase the number of homes to be planned in order to better meet the affordable housing needs of the borough. This is surprising given that there is a need for 437 affordable homes to be delivered each year. The Council note in the Housing Topic Paper that to meet this need in full would lead to a housing requirement of 1,222 dpa. This would be a significant uplift and may not be justified but it must be recognised by the council that the need for affordable housing would justify an increase the housing requirement even if it did not meet affordable housing needs in full.

10. The Council are proposing a split housing requirement between the north and the south of the Borough with the expectation that each area will be considered separately with regard to its supply position. Whilst it is reasonable to prepare a spatial strategy that seeks to allocate sites and deliver new development in the most appropriate locations the HBF do not consider it appropriate to then split the housing requirement for a single local authority area into two. Housing needs are assessed at a Borough level and there is nothing in national policy to suggest that the housing requirement should be split by HMA for the purposes of assessing housing supply against needs. The HBF consider that the boundary between housing market areas is often indistinct and whilst appropriate for the purposes of spatial planning they should not be used to prevent land in one part of the Borough from coming forward to meet the needs in another where there is a shortage of homes.

SS4: Rural Housing Requirement

11. Whilst it is helpful to set out a specific requirement for the rural areas of the Borough it is not clear in the policy how this will be used and its impact on the council's decision making in future. This is instead set out in the supporting text with paragraph 3.79 which states this is a device for monitoring delivery of rural housing which will trigger a review if insufficient homes are provided in rural areas. If this is the case the council will review options for bringing forward more homes. If this is to be an effective policy then the outcome should this level of delivery not be achieved should be set out in the policy itself. Without it the policy lacks clarity and is ineffective.

SS6: Meeting the housing requirement.

12. Table 3.3 sets out that total housing supply is 12,415 and gives a buffer of 1,240, 12.86%, above housing needs. This level of buffer between needs and supply is welcomed and necessary to deliver sufficient flexibility in housing supply to ensure that planned needs can be met in full across the plan period, as required by national policy. However, the HBF questions whether there is actually this degree of buffer in the council's housing land supply. As set out earlier in this response the HBF consider it necessary to amend the plan period in order to be consistent with national policy. This reduces the overall level of housing need to 9,900 homes. But over the updated plan period the number of homes that will be delivered is also reduced from 12,415 to 10,287. This leaves a buffer of just 3.9%. In order to maintain the 10% buffer, which the council say in paragraph 3.100 is necessary to ensure the plan is flexible and that housing needs are met in full, housing supply between 2023 and 2041 will need to be increased to 10,890 new homes as a minimum.

Housing trajectory

13. Paragraph 3.102 states that housing trajectory is provided however the HBF could not find this within the Local Plan. As the Council will be aware paragraph 75 of the NPPF requires a housing trajectory to be included in the local plan illustrating the expected rate of delivery over the plan period and must be included in the next iteration of the local plan. The HBF would also recommend that the Council set out in its evidence trajectories for all the key sources of supply that are expected to contribute to housing supply over the plan period. We note that such a trajectory has been included in the evidence, but we could not find any document setting out delivery expectation on committed sites as well as allocations. Such trajectories are essential in ensuring that stakeholders can scrutinise the council's delivery assumptions effectively, and in our experience are asked for by Planning Inspectors where these are not provided.

Small sites of less than 1 hectare.

14. 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". If the Council considers it appropriate to split the housing requirement as suggested in SS3 then it will need to ensure 10% of the housing requirement in each area is provided on sites of less than one hectare.

15. 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 and 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.
16. 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, supports local and regional supply chains and is often pivotal in bringing 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 their 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 their schemes will be permitted, allowing them to secure the necessary finance that is often unavailable to SMEs until permission is granted.

SS9: Delivery, monitoring, and contingency

17. The HBF welcome the fact that the council will monitor delivery and if the plan is not delivering new homes as expected it will implement appropriate action. Whilst the HBF welcomes the fact that it will take action what is notable is that the council does not recognise that its own actions may well be delaying the delivery of new homes. It is essential that the Council considers whether slow decisions making is impacting on the delivery of new development. Too often development is delayed whilst applicants wait for planning approval to be granted and pre-commencement conditions approved. We would also expect some of the actions listed, such as liaison with infrastructure providers, RPs, and the

development industry to be undertaken regularly and not once delivery is not in accordance with what is expected. The Council should ensure that these issues do not arise in the first place rather than waiting until the delivery of development is not as expected.

CL3: Sustainable Buildings and Energy Use

18. This policy would require all new development to demonstrate net zero operational carbon onsite by ensuring 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 any residual energy demand that cannot be met through onsite renewable energy. However, we note the last requirement is set out in the supporting text but not mentioned in the policy itself. The Council will require applicants to confirm compliance as part of their detailed planning application.

19. 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 approaches 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.

20. 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 gives consideration as to how the requirements of the proposed amendments to CL3 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).

21. Turning to the first bullet point, the Council will need to ensure the costs and deliverability of this policy and policy CL3 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"¹. 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.

22. The various specifications and costs considered are summarised in Figure 8 of Ready for Zero 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 Local Plan Viability Assessment (LPVA) which uses the assumption that achieving net zero carbon emission would be 15% per unit increase in build costs. This is lower than higher estimates suggested by the FHH and in addition it does not take into account of the fact that the cost of meeting these standards semi-detached and detached homes will be significantly higher. Given that the Council are proposing through HOU5 that over 20% of homes provided have 4 or more bedrooms the cost of CL3 is likely to be much higher than the LPVA. Therefore, the HBF are concerned that this impact of this policy on viability have not be fully assessed.

¹ <https://www.futurehomes.org.uk/library#Reports>

23. In addition, The Viability Assessment also does not appear to include any cost in relation to the delivery of carbon offsetting. 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 the proposed energy efficiency requirements to be deliverable.
24. 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 to enable a steady build-up of 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.
25. 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.
26. The Council state in paragraph 5.51 that developers will need to use methodologies such as Passivhaus Planning Package or CIBSE TM54 as part of the assessment of compliance with this policy. 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.

27. This policy requires residential development of 150 or more dwellings to be accompanied by a whole life carbon assessment to show how operational and embodied carbon have been reduced. Our concerns regarding the council's approach to operational carbon is set out above. However, if a policy requiring a higher level of carbon reduction is taken forward the assessment using SAP should be sufficient with regard to operational carbon and further comment in the whole carbon assessment is unnecessary.
28. On the issue of embodied carbon 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 carbon or how much reduction is required. Would this level of embodied carbon then be conditioned and if certain materials are no longer available 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 this requirement in CL3 to be ineffective and should be deleted.

CL4: Water use and management

29. In considering this matter the HBF recognises that the Secretary of State has said in a Ministerial Statement on the 19th of December 2023 in that “... *areas of serious water stress, where water scarcity is inhibiting the adoption of Local Plans or the granting of planning permission for homes, I encourage local planning authorities to work with the Environment Agency and delivery partners to agree standards tighter than the 110 litres per day that is set out in current guidance*”. However, It is not clear why the council consider it necessary to go below the 110 l/p/d that is allowed for through the optional technical standards set out in Planning Practice Guidance. The Council have outlined that the borough is in an area of water stress, but it does not appear that water scarcity is inhibiting the council from granting planning permissions or bringing its local plan forward. As such the 110 l/p/d remains the appropriate requirement for new homes and there is no justification for going below this standard.

30. The final paragraph is unsound. Policies in local plans relating to applicants having to show that there is sufficient capacity with regard to water supply and wastewater services are unnecessary and unlawful because they are an attempt to get applicants to do things for which they are not legally responsible. Instead, 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.

31. As the Council are no doubt be aware water companies are subject to statutory duties under S37 and 94 of the Water Industry Act 1991 (WIA 1991). Section 37 of the Act imposes a statutory duty on all water companies to provide and maintain adequate infrastructure and potable water supplies. This section states:

“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.”

32. Consequently, it is for the water company to plan for and then provide a sufficient supply of water whilst also considering its other obligations relating to wider environmental impacts such as those raised by Natural England. It is not for the developer to either anticipate those or to have to remedy them. Simply put the issue of water supply when considering planning applications is not a land use planning matter but one to be resolved by the water company in conjunction with the relevant statutory agencies.

33. If the water company is unable to supply water to meet expected levels of development, this must be disclosed in the WRMP. If unforeseen events occur after the WRMP is adopted, meaning that the water company is then 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.
34. If water services cannot be guaranteed, then the development requirements in the local plan cannot be delivered. Consequently, the local plan is unsound. The plan cannot be made sound in relation to matters of water through policies in that plan stipulating actions that applicants must take as they cannot provide the water services.
35. Housebuilders cannot resolve the problems relating to water services through policy measures or conditions. Water companies, local authorities, and the Environment Agency cannot ignore their statutory responsibilities in terms of planning for water by deflecting this onto housebuilders. Therefore, this paragraph in CL4 should be deleted as it is not consistent with the legal framework governing the supply of water and wastewater service to new development.

BIO3: Biodiversity Net Gain

36. This policy sets out the legal requirement for development to deliver a 10% biodiversity gain biodiversity. Our first concern is that the policy relates to all development of one or more dwelling whereas the legislation set out a number of exemptions including de minimis development of less than 25sqm. The HBF would therefore recommend the policy is amended to be consistent with the legislation or simply refer to development requirement by the Environment Act to provide a 10% BNG.
37. Our second concern is that the Council refer to application of the mitigation hierarchy instead of the Biodiversity Hierarchy. Paragraph 74-008 states that the two are distinct with the mitigation hierarchy relating to the refusal of development where significant harm to biodiversity as a result of development cannot be avoided, adequately mitigated, or compensated whereas the BNG hierarchy sets out the priority actions with regard to the delivery of the 10% net gain. Therefore, the Council should amend point i) to "*Biodiversity Hierarchy*" to ensure consistency with the Act and avoid confusion for decision makers.

38. Finally, the Viability Assessment uses the 2019 DEFRA Impact Assessment (IA) as the basis for its costings. It must be remembered that these costs are very general figures used to assess the overall impact of a national policy on the basis of past examples of delivering net gain. What the figures from the DEFRA IA cannot account for is that some schemes will face much higher costs than expected and as such the impact on viability will be more significant. It is self-evident that until the baseline biodiversity on site is measured it is impossible to know what these costs are. Given that the 10% is a non-negotiable statutory requirement the council will need to ensure other policies are sufficiently flexible to ensure that development is not made unviable by the policies in this local plan and that this flexibility is clearly signalled to decision makers.

DES4: Public Art

39. The HBF would question whether a requirement for development to provide public art is justified on developments of 300 or more homes. Whilst we can see why as part of major urban regeneration projects public art could be seen as an essential element of redevelopment; this is not the same with residential development where public art should be secondary to a well designed development. Public art may form part of the design but this should be for the developer to decide and not the council.

HOU1: Affordable Housing

40. This policy states that in seeking to meet the need for affordable housing the council will negotiate on the basis of sites of 15 or more delivering 40% affordable housing and sites of 10 to 15 units delivering 30% affordable housing. The decision to set out a negotiating starting point in the plan stems from the LPVA which suggests that there is no uniform level of affordable housing provision where it can be said most schemes are viable. As the Council will be aware the NPPF and PPG both seek to limit the extent to which negotiation is required as a result of local plan policies. As such a local plan that relies on a negotiation to secure the delivery of its development requirements will face challenges as to its soundness. Given that 40% is challenging for a significant number of developments aside from those in the highest value areas the Council will need to consider whether a differential rate between value areas or at the very least between greenfield and brownfield land would be possible.

41. If this is not possible and the council considers it necessary to rely on negotiation it must be made clearer in the local plan that this is the case, in order to convey to decision makers that a lower level of affordable housing provision is acceptable and not the exceptional occurrence referred to in paragraph 5.358 of the Local Plan. Whilst this is consistent with paragraph 58 of the NPPF it is clear that the council considers it necessary to depart from this approach and as such must clearly state its position both in the policy and the supporting text. This will ensure that where development comes forward with affordable housing provision below that set out in the plan, decision makers will not seek to prevent it on the basis of paragraph 58 of the NPPF and that decision makers can assume development that accords with all of a local plan's policies is viable.
42. Finally, it is not clear why the Council have set a site size threshold for development of between 10 and 14 units that is lower than that for major development, the threshold set out in paragraph 65 of the NPPF. If the Council are to include a site size threshold this must be consistent with the definition of major development of 0.5 ha.

HOU5: Provision of housing to meet our needs.

43. Whilst the HBF welcome what is relatively flexible approach to housing mix it is not justified for the council to base considerations of mix on the needs of newly formed households. Whilst the needs of newly formed households should be considered there will be existing households that have a need for a larger home as a family expands, or indeed smaller home as they seek to downsize. By restricting the consideration of housing mix to just newly formed households there is potential for the needs of current households to be dismissed. The HBF would suggest that part b is amended to: "*a mix of homes by size (including number of bedrooms), type and tenure, which take account of the composition of the current housing stock, identified needs and other appropriate local evidence on needs and the supply of new homes*".
44. The HBF *would* question whether the size mix of affordable homes being promoted by the Council in paragraph 5.399 and how this interacts with the requirement to ensure 25% of all affordable homes are First Homes. It is assumed that the delivery of First Homes would be required to provide a mix of units as set out in paragraph 5.399. However, if developers are required to provide three bedroomed houses as First Homes it will have an impact on viability and the deliverability of development given that in Test Valley such homes even with a 50% discount would be well in excess of the price cap of £250,000. As can be seen

from Table 6.15.1 of the LPVA a 50% discount would significantly reduce residual land values, especially on larger sites and should this discount in effect be increased due to the cap then the impact will be even greater. As we note in our comments on HOU1 for many development scenarios across Test Valley viability is challenging when the cumulative impacts this plan are taken into account. To require a mix of first homes that would, due to the cap, require discounts in excess of 50% which would impact on viability, and it is something that the Council do not appear to have considered in the LPVA. Until this issue is tested the proposed mix of homes in paragraph 5.399 cannot be considered sound.

45. In revisit this policy the Council could be more specific with regards to how the mix for First Home is applied by removing the need for First Homes to come forward on homes or more bedrooms. This would ensure that fewer First Homes sold fall outside of the cap reducing the negative impacts of the First Homes requirement on viability.
46. HOU5 also includes the council's policy with regard to supporting the specialist housing needs of older people. The policy requires major development to consider the needs of those requiring specialist accommodation. This is insufficient and is not a positive approach to meeting the specialist accommodation needs of older people. Firstly, the HBF would recommend that housing needs of older people are included either in the policy or the supporting text. It is important for decision makers to be aware of the need for such homes and for the delivery of such homes to be monitored against those needs. Secondly the Council should include a positively worded policy in the local plan that supports the provision of specialist accommodation for older people and where shortfalls are identified will implement a presumption in favour of such development.

HOU6: Residential Space Standards

47. The HBF could not find any evidence to support the requirement for all residential development to meet the national described space standard as required by national policy. If the council wants to implement these standard than it will need to provide robust evidence that these standards are needed and will not impact on the viability of development of the affordability of housing in the Borough.

Self-build and Custom Build Housing

48. The policy requires 5% of homes expected to be delivered on sites of 100 or more units to be provided as plots for self-build or custom housebuilding. The evidence presented by the Council that on average 34 people have request to be added to the self-build register each year since 2016. The Council say that this gives an indication as to future needs but then gives not explanation as to why and whether it has revisited this evidence and considered whether those on the list are still seeking to self-build and have the financial capacity to do so. The council will need to ensure that this evidence is robust and reflects an on-going growth in demand for self-build.
49. Secondly, the Council will need to consider whether those on the register are likely to want a plot on a large development. Notably a significant number of those on the list are seeking a plot in rural area or village location. This is not uncommon with many of those looking to build their own home not wanting a plot on large residential development. As such the Council need to identify alternative solutions to meeting the demand for self-build plots other than on large sites. One approach would be a policy that sets out a more permissive approach to small sites on the edge of settlements where these would support self or custom build housing to come forward.
50. The PPG also sets out how local authorities can increase the number of planning permissions which are suitable for self and custom build housing other than policies such as the one being proposed in this local plan. 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 the allocation of small and medium scale sites specifically for self & custom build housing, and permitting self & custom build development outside but adjacent to settlement boundaries on sustainable sites, especially if the proposal would round off the developed form.
51. Finally, should the council continue with this policy a 24 month marketing period is unjustified. If there is demand for such plots, as the council state there to be, then a longer period is unnecessary. The HBF would suggest marketing period of 12 months would be more appropriate.

TR3: Parking

52. The policy requires development to be in accordance with standards set out in the Council's adopted parking standards. This is unsound as it seeks to confer status of a local plan policy on guidance published outside of the plan making process. The Council can provide guidance in SPD, but it cannot require develop to accord with it. If it wishes to require specific standard they should be included in the local plan, if not the policy should be amended to state that development should have regard to the adopted parking standards.

Future engagement

53. 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'.

Mark Behrendt MRTPI
Planning Manager – Local Plans
Home Builders Federation
Email: mark.behrendt@hbf.co.uk
Tel: 07867415547