

**Home Builders Federation**

**Matter 1**

**Matter 1: Procedural/legal requirements**

**Issue: Whether all Statutory and Regulatory requirements have been met?**

**Duty to Cooperate**

*Q.1. Is there clear evidence that the Council has engaged constructively, actively and on an ongoing basis with neighbouring authorities and prescribed bodies in accordance with section 33A of the 2004 Act in respect of strategic matters with cross-boundary impacts considered through the preparation of the Plan?*

The HBF do not dispute that the Council has engaged with neighbouring authorities and prescribed bodies in accordance with section 33A of the 2004 Act. Our main concern is that the outcomes of this co-operation do not appear to have informed plan making and the decision not to meet housing needs in full. The shortfall in housing needs across West Sussex is significant with both Horsham’s submitted plan falling short of meeting needs by 2,250 homes and Worthing’s local plan being adopted with a shortfall in excess of 10,000 homes. Alongside this Havant which borders Chichester to the west has stated that they expect their shortfall to be in the region of 4,000 homes – a figure which will be much higher should the new standard method be adopted. These are significant shortfalls that will impact on affordability across the sub region and the HBF consider these to have been given insufficient consideration in the decision by the Council not to meet own housing needs in full and the benefits of doing so.

**Matter 2 Strategic Policies**

**Issue: Whether the strategic policies of the Plan would look ahead over a minimum of 15 years from adoption as per paragraph 22 of the National Planning Policy Framework (NPPF)?**

*Q.12 The strategic policies of the Plan would cover the period 2021 to 2039. Given the anticipated adoption date of the Plan as set out in the LDS, the strategic policies would not look ahead over a minimum of 15 years from adoption as per NPPF paragraph 22. What is the justification for this, and is the Plan positively prepared in this regard?*

The plan period is inconsistent with national policy in that it looks ahead for 14 years from its likely adoption in 2025, subject to it be found sound. In order to be consistent with national policy it should be extended by a single year.

**Matter 3: The Spatial Strategy**

**Issue: Is the spatial strategy positively prepared, justified, effective, and consistent with national policy?**

**Policy S1 Spatial Development Strategy**

*Q.13 What is the justification for the proposed distribution of development in the plan area?*

For Council.

*Q.14 In assessing the transport impacts of housing growth, what reasonable alternative levels of housing growth were considered for the southern plan area and why were they discounted? (see also Matter 4A transport)*

This is broadly for the council to answer and out comments on transport are set out in our response to Matter 4A. However, it would appear that the council tested through the TA 534 dpa and 638 dpa in the southern plan area. It is notable that 638 is the level of need for the whole of the local plan and it is surprising that the TA did not test 598 dpa in the southern plan area to consider whether housing needs could be met in full. This would appear to be a reasonable alternative to consider given the requirement in national policy to meet housing needs in full.

*Q.15 The final paragraph of the Policy says ‘To ensure that the council delivers its housing target, the distribution of development may need to be flexibly applied, within the overall context of seeking to ensure that the majority of new housing is developed in accordance with this Strategy* where *appropriate and consistent with other policies in this plan. Any changes to the distribution will be clearly evidenced and monitored through the Authority Monitoring Report’. What is meant by ‘flexibly applied’? Is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?*

For council.

*Q.16 Are the proposed main modifications (MMs) necessary for soundness?*

No comment

**Matter 4A: Transport**

**Issue: Would the Plan be effective in ensuring that any significant impacts from the development proposed on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?**

**Issue: Are the individual transport policies clear, justified and consistent with national policy and will they be effective?**

**Transport evidence**

*Q.20 The Chichester Area transport model was updated in 2018, and further analysis and surveys were undertaken in November 2023 in order to verify its outputs and to attempt to confirm that the evidence may be relied upon. Is the Plan underpinned by relevant and up-to-date transport modelling evidence? Is this evidence adequate and proportionate?*

From discussions with our members HBF are concerned that the transport evidence is overly pessimistic and appears to consider the worst-case scenario. One example of these concerns is in relation to the trip rates used within the study. Then most recent update for example uses a trip rate agreed between WSCC and NH which are set out in table 6-2 and show total trip rates of 0.472 for the AM and 0.477 for the PM. These are higher than recent evidence published by TRICs in 2022 which notes that for the mixed housing developments category used in the Councils’ TA is 0.422 for the AM peak and 0.414 for the PM peak. We would also aware of evidence submitted by our members that highlight that others areas in Sussex are using lower trip rates compared to those used in Chichester.

What is also notable from this research is that the peak trips have been reducing overtime with the average trip rate reducing by 5.4% between 2001-2011 period and the 2011 to 2021 period. HBF are concerned that similar behavioural changes that will have taken place in Chichester may not be accounted for due to the TA using a 2014 baseline for its data. The TA states that the 2014 and 2023 are comparable thus supporting he 2014 model. However, this would appear to be undermined by the TA itself which highlights in Appendix B Figure 7 not insignificant reductions in flows between 2014 and 2023 at the Fishbourne and Stockbridge roundabout

Whilst there will be local circumstances to take into account it would appear that the Council have used a relatively high trip rate. Over the life time of this plan, it is likely that trip rates will be lower as more of the population works from home reducing peak hour travel further. In addition, increased flexibility with working hours and the growth of home delivery will also change travel patterns with fewer peak hour journeys. The Council have recognised this to some extent with a 5% reduction on strategic sites to take account of development specific travel planning and behavioural change packages but wider reductions from more general trends does not appear to have been considered.

In addition, Figure 3.1 indicates an internalisation of 5% and we could not find the justification for this figure. For larger sites the level of internalisation could be higher and HBF suggest that evidence must be presented as to why it is assumed to be 5%.

Given that the Council are not able to meet their housing needs and that there are significant shortfalls in housing across West Sussex, HBF would have expected the Council to undertake sensitive testing with regard to trip generation to examine the impact of lower trip rates that are likely to be more reflective of change travel patterns. HBF consider insufficient modelling has been undertaken to examine whether a higher level of housing could have been achieved and as such the housing requirement is not justified.

*Q.21 How has the employment growth set out in the Plan (as set out in Policies E1 and E3) been considered in the transport assessment and what if any part would it play in the monitor and manage approach?*

No comment.

**The spatial distribution of housing to the southern plan area**

*Q.22 The broad spatial distribution of housing proposed in the Plan is for 535 dwellings per annum (dpa) in the southern plan area. In transport terms, what is the justification for the 535 dpa ‘cap’ on new homes in the southern plan area?*

This is broadly for the Council to answer but HBF would suggest that any decision to cap housing growth will require further work to consider lower trip rates that are more reflective of current and future travel patterns.

*Q.23 What is the evidence that there would be unacceptable impacts on highway safety, and/or the residual cumulative impacts on the road network would be severe with a level of housing development in the southern plan area with a level of housing provision over 535 dpa?*

This is broadly for Council. However, HBF would refer you to our response to Q20 that the trip rates appear to be too high and that the potential impact of new development on the congestion and safety may be over stated. Further work is needed to understand the potential impact of lower trip rates that reflect the changing travel patterns that taking place and that are likely to continue across the plan period.

*Q.24 What is the specific evidence that new housing development over 535 dpa in the southern plan area over the plan period should be prevented on highways grounds?*

For council.

**Matter 4C: Housing**

**Issue: Is the proposed approach to housing development positively prepared, justified, effective, and consistent with national policy?**

**Local Housing Need**

*Q.60 Is there any substantive evidence to demonstrate that it would be appropriate to plan for a higher housing need figure than the standard method indicates in this case as per advice set out in the PPG (Paragraph: 010 Reference ID: 2a-010-20201216)?*

No comment.

**Unmet needs of neighbouring areas**

*Q.61 Is there any substantive evidence that the Plan should be accommodating unmet need from neighbours, and if so, would it be sound to do so?*

There is evidence to show that there are unmet needs arising from a number of neighbouring areas. Horsham the recently sub mitted local plan sets out a shortfall of 2,275 homes over the plan period and Havant, to the west of Chichester, have also stated that it is unlikely that will be to meet their own housing needs with a shortfall in the region of 4,000 homes – a situation that is unlikely to be rectified if the proposed changes to the standard methods are adopted which increase Havant’s housing needs from 508 dpa to 874 dpa. While not adjacent it is also important to note that authorises such as Worthing and Portsmouth have, or are likely to have signficnasnt shortfalls. Worthing’s adopted local plan sets out a shortfall of over 10,000 homes and Portsmouth’s recent regulation 19 consultation on their local plan noted a 3,500 home shortfall. Some of the constraints, such as water neutrality in Horsham, can be addressed but others such as Havant, Portsmouth and Worthing are a result of high needs and highly constrained boundaries – issues that cannot be addressed overtime.

Therefore, if there is capacity in Chichester to meet some of those needs then it would be sound for it to do so. As for whether it is sound to accommodate these depends on whether the constraints highlighted by the Council with regard to transport are considered to be robust. If through the examination, it is found that here is capacity over and above the minimum Chichester are required to deliver then the Council would need to consider the allocation of additional sites to address some of these needs.

**Affordable Housing need**

*Q.62 Is there any substantive evidence to demonstrate that there should be an adjustment to the minimum housing requirement to help deliver affordable housing with regard to the PPG (Paragraph: 024 Reference ID: 2a-024-20190220), and if so, would that be effective?*

Where affordable housing needs are not being met in full an adjustment to the housing requirement would be appropriate. Again, in the case of Chichester this will very much depend on whether the constraints presented that is limiting growth in the district are considered to be sound.

**Housing needs of different groups in the community**

*Q.63 Is the Plan positively prepared in assessing and reflecting in its policies the size, type and tenure of housing needed for different groups in the community as per NPPF 62?*

No comment

**Policy H1 Meeting Housing Needs**

**The housing requirement**

*Q.64 Policy H1 Meeting Housing Needs sets a housing requirement for the full plan period 2021 – 2039 of at least 10,350 dwellings. This is below the local housing need for the area as determined by the standard method. The justification for the proposed provision of 535 dpa in the southern area has been considered under Matter 4A Transport. Is the proposed figure of 40 dpa in the northern part of the plan area justified?*

If transport evidence in southern part of the borough is constraining development, then it is imperative that the Council examine all potential opportunities in the northern part of the plan area. HBF does not promote sites but if there is potential to deliver sustainable development in this area that will increase housing supply then the this should be considered.

Policy H1 is also likely to require modification to set out an immediate review of the plan to take account of proposed changes to the NPPF that are currently being consulted on. While these changes are still out for consultation should the remain as currently presented consideration will need to be given to paragraph 227 of the amended NPPF which states:

*“Where paragraph 226 c) applies, local plans that reach adoption with an annual housing requirement84 that is more than 200 dwellings lower than the relevant published Local Housing Need figure86 will be expected to commence plan-making in the new plan-making system at the earliest opportunity to address the shortfall in housing need.”*

The proposed standard method would see Chichester’s housing needs, across the whole of the Borough, increase from 760 dpa to 1,206 dpa and will require the council to prepare a new plan immediately. However, it is the HBF’s experience that without an incentive to review a recently adopted plan these are rarely undertaken at rapidly. Therefore, a strong review policy is required that set out clear dates as to when a new plan will be submitted, and the consequences should that plan not come forward in the agreed timescale. HBF would recommend a policy is included in H1 or separately along the lines of that adopted in the Bedford Local plan 2030 (reproduced in appendix A). This policy was included in the Bedford Local Plan in similar circumstances when the 2019 NPPF was adopted introducing the Standard Method.

*Q.65 Would the adverse impacts of the Plan not providing for objectively assessed housing needs significantly and demonstrably outweigh the benefits of doing so when assessed against the policies in the NPPF taken as a whole? That is to say is the overall housing requirement justified?*

The sole reason given by the Council for not meeting housing need is the impact of new development on traffic and the increased congestion it would cause. As set out above HBF consider further testing is required with regard to trip rates which are considered to be too high. Small adjustments to these rates can have a significant impact on the outcomes of transport assessment reducing the impact of housing growth on the highway network in Chichester.

This is particular important in areas such as Chichester, and indeed the south east in general, given the shortfalls in housing and increasing unaffordability of accommodation for many households. There is a growing demand for new homes across this sub region with many of those areas with highest needs being too constrained to meet these in full, as we set out in our response to Q61. This inevitably places significant pressure on the housing market increasing the cost of housing and reducing the overall affordability of an area to may who live and work in the area. The Council not meeting its own needs, or seeking to contribute to addressing the needs of other areas, adds to that pressure. In Chichester the average housing price rose from £271,000 in 2013 to 430,000 in 2023 with the affordability ratio increasing from 11.13 to 13.51. A failure to meet it housing needs will only add to this

The poor affordability in Chichester and its neighbouring areas also means that there is significant need for more affordable housing. Table 6.3 of the HEDNA notes that the need for social and affordable rent in the borough is 278 dpa and in paragraph 6.152 it noted that the need for affordable home ownership products of 301 dpa. This is a high level of need and one that will be made worse by the decision not to meet housing needs in full.

The Government have given high priority on ensuring housing needs are met and it is important that a similar priority is given to this issue in this local plan. While there will be some negative consequences on highways as a result of new development HBF consider these have potentially been overstated due to the trip rates used. Therefore, we consider it essential that the Council revisit its TA to include lower trip rates that are more reflective of current and future travel patterns.

*Q.66 Paragraph 5.2 of the Plan sets out that the housing requirement would be made up of 535 dpa in the southern area and 40 dpa in the northern area. These figures are not included in Policy H1. Is this effective?*

HBF did not comment on this but would recommend a single housing requirement for the plan area and it is not split between the two locations. The housing requirement is for the borough as a whole and should be treated as such in policy.

*Q.67 Are the suggested MMs necessary for soundness?*

HBF would suggest that a modification is required to include in the policy a commitment to an early review. This

**Housing land supply**

**Policy H1 Meeting Housing Needs sets out the broad sources of supply to meet the housing requirement. Housing land supply will be provided by the Plan, the existing site allocation DPD, a new DPD and Neighbourhood Plans. The Plan therefore is not singly providing for all the supply in the plan period, though it is setting the overall housing requirement.**

*Q.68 Are the components of the overall housing land supply set out in Policy H1 (as updated in BP07 Housing supply background paper) justified?*

*Specially:*

* *Is footnote 29 as set out in the submitted Plan regarding Site Allocation DPD allocations correct given that policies of that plan are not to be superseded by this Plan?*
* *What is the compelling evidence that windfall sites will make the anticipated contribution to housing land supply over the plan period?*

No comment.

*Q.69 Will there be a five-year supply of deliverable housing sites on adoption of the Plan?*

HBF did not comment on the five year land supply is at that time it appeared as if the Council had a five year land supply. Having reviewed the updated BP07 HBF are concerned that the Council may not have a five year housing land supply on adoption. In calculating its five year housing land supply the Council have included the surplus from the preceding years wholly within the following five years. This approach is then included in the plan through the proposed modification to paragraph 5.5. As the inspector’s will be aware PPG is silent on how over supply with inspector’s taking different views on whether it should be included in the calculation of the five-year land supply, most notable in Tewkesbury and the appeal Land South of Oakridge, Highnam, Gloucester (Reference: APP/G1630/W/17/3184272) where the inspector considered it inappropriate to bank over supply the five-year land supply assessment. This appeal resulted in a judicial review ([2021] EWHC 2782 (Admin)) in which Justice Dove outlined that the NPPF was silent on this matter and as such it was a matter of planning judgement for the decision maker.

If it is accepted by the inspectors that surplus can be taken account when assessing five-year housing land supply, the HBF would expect this to spread across the remaining plan period. The council have instead considered surplus in the same manner as it is required to consider any shortfalls. However, the reason for considering shortfalls in the first five years is to ensure that these are delivered sooner and not pushed back to the end of the plan period. It is a mechanism to ensure poor performance is addressed sooner rather than later and as such is not applicable to a surplus which is generated as a result of the council seeking to meet needs across the plan period as a whole. It is therefore not considered by HBF to be sound for any surplus to be spread across only one five year period of the plan. If the surplus generated between the start of the plan period and its adoption in 2025 is spread across the whole of the remaining plan period, our conclusion is that the Council will have a land supply of just 4.64 years. Whilst this increases to 5.02 years in 25/26 it is still marginal, and we are concerned that without additional supply in the first five years after adoption the plan will be considered out of date on the basis that it does not have a five year land supply. Our assessment of the Council’s five year land supply with the surplus each year spread across the remaining plan period is included in appendix A.

*Q.70 Would at least 10% of the housing requirement be accommodated on sites no larger than one hectare to be consistent with NPPF 69?*

Table 15 of the Housing Supply Background paper shows that the Council expect to 1,179 homes to be delivered on sites of less than one hectare. This is 230 homes short of the required 10% which the Council state will be met through small site allocations in neighbourhood plans. Firstly, it is in no way certain that the neighbourhood plans will deliver the additional 230 homes. They may allocate some homes on small, but no evidence is provided to show that they will. This would appear to be an assumption and clear evidence will be required to show that such allocations will be made in neighbourhood plans.

However, HBF have further concerns with the likely supply of small sites from windfall is included in its supply of small sites. We do not consider this to be a sound approach as it is inconsistent with the expectations of national policy. The NPPF is clear that the 10% should be on land identified in the plan yet the Council include likely supply from windfalls which are not sites identified in either the local plan or brownfield register. Removing these from the Council’s expectations for small sites means that the Council can only show a supply of 531 homes on identified sites of less than one hectare and leaves a shortfall of nearly 819 homes to be delivered on sites of less than one hectare rather than the surplus identified by the Council.

It is important to recognise that the intention of this policy stems from the Government’s desire to support small house builders by ensuring that they benefit from the 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.

The Council is failing to recognise that by not allocating more small sites it is contributing to the 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 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.

In order for the plan to be found sound the Council must identify additional small sites for allocation in the local plan or identified in the Brownfield Register in order to ensure that 10% of the housing requirement is on small sites that have actually been identified.

**Policy H6 Custom and/or Self Build Homes**

*Q.79 Are the 200 unit threshold and the % of market units requirements justified?*

Table 1.1 in the Self and Custom Build Note (H13) indicates that since 2016 190 people have asked to be put on the that Council’s Self and Custom Build Register. The note goes on to say that the local eligibility test has only applied since 2018 and as such this figure likely overestimates demand. The paper therefore notes that there are currently 66 applications on the self-build register, which is an average of 12 people registering per annum. This would in itself would suggest that there is limited demand for self-build in the borough. It is also notable that the part 2 register, those who the council consider having met other eligibility criteria is just 9 people.

The Council correctly state that they should take account of the part 1 and part 2 register but even considering both parts the evidence does not indicate that there is substantial demand for self-build. The HEDNA points to broader evidence from the NaCSBA but this is based on the Right to Build Register. While this provides further evidence it may have shortcomings in that there is potential for double counting of demand across an area as an individual can express an interest in numerous locations. It is not clear from the evidence whether the Council have removed any double counting from the evidence where individuals have expressed an interest in all three of the postal districts highlighted. It is also not clear whether the Council have examined whether these induvial have expressed an interest in areas outside of Chichester. If not, there is a risk of numerous LPAs seeking to deliver plots for the same individual.

It is also not clear from the evidence provided is whether those on the Right to Build register want a plot on major development site. The register allows for those signing up to register to state a preference as to the type of plot they want. Such information would have been helpful in determining the approach the council should take rather than assuming many of those want to self-build will want a plot on a strategic house building site.

The note goes on to consider the supply of sites in the borough stating in paragraph 1.27 that 211 self-build dwellings have been granted permission and that the market is by and large meeting the needs of self-builders within Chichester as identified by the self-build register. While the council note there is a 20 unit back log in the last three years the evidence would suggest that over a plan period the delivery of self-build plots through windfall will meet needs.

In addition, HBF could not find any evidence as to how many homes will be delivered through this policy, alongside windfall delivery, and whether this is reflective of the demand for self-build that is indicated by the register. It is essential that should a percentage be required this is reasonable and does not result in an over supply of homes and the need for developers to go back to the council to amend planning conditions relating to self-build provision.

Finally, as mentioned in our representations the Council will need to show that they have considered other approaches to meeting the demand for sell build homes that are set out in paragraph 57-025 of PPG. In particular the Council should have examined whether there are opportunities to meet the demand for self-build plots through the disposal of its own sites or by working with landowners to bring forward specific sites that will be able to provide plots.

*Q.80 Should the definition of self-build plots be set out in the Plan for effectiveness?*

No comment.

*Q.81 Are the suggested MMs necessary for soundness?*

HBF do not support the proposed modification in particular the increase in the requirement on strategic sites from 2% to 5%.

**Policy H8 Specialist accommodation for older people and those with specialised needs**

*Q.84 What is the justification for the 200 unit threshold in Policy H8 and would it be effective?*

For Council.

*Q.85 Would the Policy/Plan be effective in addressing the housing needs of different groups given that no indication is given of assessed need?*

No. While there is no direct requirement to do so in national policy the HBF would argue that in order for the policy to be effective it needs to be clear as to what is required and how a decision maker should react to ensure those needs are met. By including the level of need in the policy or supporting text, as it has in relation to student accommodation, greater weight will be given to this in decision making, leading to the more positive approach that is required to meet housing the needs of older people.

**Matter 5: Other policies**

**Policy NE5 Biodiversity and Biodiversity Net Gain**

*Q.122 Is footnote 19 necessary for effectiveness? Is this a matter more properly dealt with in the explanatory text?*

No comment

*Q.123 Are the suggested MMs necessary for soundness?*

Proposed modification CM073 is necessary but overly restrictive as to the delivery of offsite mitigation outside of the Borough. Offsite provision does not have to be in an area of strategic significance identified by the LNRS with government guidance[[1]](#footnote-2) stating that Biodiversity gains may be delivered anywhere in England. As such the approach set out the proposed modification is inconsistent with national policy and unsound. HBF propose CM073 is amended to:

*d) Where it is agreed on site provision or delivery within the borough of net gains is not possible, off-site provision outside the Plan Area will be permitted.*

**Policy NE17 Water neutrality**

*Q.143 What is the justification for the 85 litres of mains supplied water per person per day as set out in criterion 1 a)?*

HBF did not comment on this policy at the time given the relatively small area affected but would like to raise some concerns with regard to the approach taken. It is important to recognise that it is ultimately 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. If the water company is unable to supply those needs, this needs to be disclosed in the 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 HBF would agree that the local authority must reflect those problems in its local plan. However, in the Sussex North Water Resource Area the approach being proposed falls heavily on the development industry who must not only reduce water use in new homes to 85 l/p/d but also ensure any residual water use to achieve neutrality is offset. This can be achieved through the Sussex North Water Offsetting Strategy (SNOWS) or through another appropriate offsetting scheme.

The HBF have a number of concerns with this approach. Firstly, it requires developers to provide offsetting of water use to address an issue that is not its responsibility to resolve and is therefore inconsistent with the requirements for planning obligations set out in paragraph 57 of the NPPF and section 121 of the Community Infrastructure Levy Regulations. Offsetting may be required in order to bring forward development, but it is for the water company to pay for not the development industry.

Secondly, even if it is considered sound that offsetting payments are consistent with paragraph 57 of the NPPF we are concerned as to the effectiveness of this strategy, the potential costs and whether it will be effective in securing long term reductions in water use. Whilst this may not impact on the deliverability of this plan it will on the rest of the North Sussex HMA potential increasing unmet needs in Horsham and Crawley. Therefore, any assurances by the Council and its statutory partners with regard offsetting will need to be examined carefully. In particular consideration will need to be given to:

* the degree of risk that the practical implementation of the SNOWS water neutrality strategy will be delayed; and
* Whether there is sufficient capacity SNOWs will be available to all development in affected areas that requires offsetting or whether credits will be rationed.

To conclude, whilst the impact of water ground water abstraction at Pulborough on protected sites known collectively as the Arun Vallery sites must be considered by the Council as part of this local plan, the HBF do not consider a solution that shifts a significant part of the burden for addressing this issue from Southern Water to the development industry to be consistent with current legislation or national policy. It should be for Southern Water to use its resources to secure the necessary solution and not house builders, or indeed others in the development industry. If Southern Water is unwilling to meet its legal duties to ensure sufficient water supplies or fund the level of offsetting required to support local plans, then the only conclusion is that plans reliant on this policy are unsound.

**Policy P1 Design Principles**

*Q.154 Are the suggested MMs necessary for soundness?*

HBF consider the suggested modifications to be necessary for soundness.

**Policy P6 Amenity**

*Q.157 Policy P6 proposes that the nationally described space standards should be met as a minimum in housing development (subject to defined exceptions). What is the justification for this? What is the need for the application of the space standards, and what if any implications would this have on viability?*

PPG requires there to be evidence of need in relation to the application of space standards. However, HBF could not find any evidence supporting the need for space standards. Without this evidence requirement to meet these standards is unjustified. In order to adopt the space standards, the council must provide the necessary evidence.

**Policy P15 Open Space, Sport and Recreation**

*Q.172 Are the suggested MMs necessary for soundness?*

The HBF would agree with the proposed modifications.

**Policy I1 Infrastructure Provision**

*Q.178 Are the requirements of paragraph 2 of Policy I1 consistent with NPPF 56 and Regulation 122(2) of the Community Infrastructure Levy Regulations 2010?*

No comment.

*Q.179 Are the suggested MMs necessary for soundness?*

HBF would suggest that point (vii) is deleted rather than amended given that development is required by building regulations to provide the on-site infrastructure to support access to super-fast broad band where it is available.

Mark Behrendt MRTPI

Planning Manager – Local Plans SE and E

**Appendix : Review Policy from Bedford Local Plan 2030.**



**Appendix. Five-year land supply – surplus averaged across remain land plan period.**

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Year** | **2021/22** | **22/23** | **23/24** | **24/25** | **25/26** | **26/27** | **27/28** | **28/29** | **29/30** | **30/31** | **31/32** | **32/33** | **33/34** | **34/35** | **35/36** | **36/37** | **37/38** | **38/39** |
| **Requirement** | 575 | 575 | 575 | 575 | 575 | 575 | 575 | 575 | 575 | 575 | 575 | 575 | 575 | 575 | 575 | 575 | 575 | 575 |
| **Cumulative** | 575 | 1150 | 1725 | 2300 | 2875 | 3450 | 4025 | 4600 | 5175 | 5750 | 6325 | 6900 | 7475 | 8050 | 8625 | 9200 | 9775 | 10350 |
| **Delivery** | 712 | 904 | 607 | 574 | 649 | 522 | 446 | 451 | 774 | 790 | 839 | 663 | 485 | 467 | 478 | 497 | 485 | 409 |
| **Cumulative** | 712 | 1616 | 2223 | 2797 | 3446 | 3968 | 4414 | 4865 | 5639 | 6429 | 7268 | 7931 | 8416 | 8883 | 9361 | 9858 | 10343 | 10752 |
| **Surplus/deficit** | 137 | 466 | 498 | 497 | 571 | 518 | 389 | 265 | 464 | 679 | 943 | 1031 | 941 | 833 | 736 | 658 | 568 | 402 |
| **5-year requirement** | 2875 | 2875 | 2875 | 2875 | 2875 | 2875 | 2875 | 2875 | 2875 | 2875 | 2875 | 2875 | 2875 | 2875 |  |  |  |  |
| **Add deficit/remove surplus** | 2875 | 2835 | 2729 | 2709 | 2698 | 2655 | 2659 | 2698 | 2743 | 2617 | 2451 | 2201 | 2016 | 1934 |  |  |  |  |
| **Buffer** | 144 | 142 | 136 | 135 | 135 | 133 | 133 | 135 | 137 | 131 | 123 | 110 | 101 | 97 |  |  |  |  |
| **Total req** | 3019 | 2976 | 2866 | 2844 | 2832 | 2788 | 2792 | 2833 | 2880 | 2748 | 2573 | 2312 | 2117 | 2031 |  |  |  |  |
| **5-year supply** | 3446 | 3256 | 2798 | 2642 | 2842 | 2983 | 3300 | 3517 | 3551 | 3244 | 2932 | 2590 | 2412 | 2336 |  |  |  |  |
| **Surplus/deficit** | 427 | 280 | -68 | -202 | 10 | 195 | 508 | 684 | 671 | 496 | 359 | 279 | 295 | 305 |  |  |  |  |
| **5YHLS** | **5.71** | **5.47** | **4.88** | **4.64** | **5.02** | **5.35** | **5.91** | **6.21** | **6.17** | **5.90** | **5.70** | **5.60** | **5.70** | **5.75** |  |  |  |  |

1. <https://www.gov.uk/guidance/make-off-site-biodiversity-gains-as-a-developer#choosing-where-to-achieve-off-site-biodiversity-gains> [↑](#footnote-ref-2)