

## Home Builders Federation

### Matter 2

#### Matter 2 Amount of development needed in the District Plan period

*PQ2.1. To be consistent with national policy and effective, should the Plan be modified to cover the period 1 April 2024 to 31 March 2041?*

HBF would agree with the modification being proposed to plan period. It is appropriate and consistent with the application of the standard method for the plan period to commence in the year in which the assessment was undertaken and for the period to extend at least 15 years from the point of adoption as required by paragraph 22 of the NPPF.

*Q2.2. Would modifying policy SP10 to set a housing requirement of at least 13,005 homes between 2024 and 2041 (765 per year) make the Plan consistent with national policy, positively prepared, justified and effective?*

The proposed modification suggested would be consistent with the application of the standard method. However, the question that must be consider is whether the plan as submitted is unsound for including a housing requirement that is above the minimum that the LPA is required to plan for. Any modifications must be made the plan on the basis of soundness and just because the minimum starting point for the consideration of the housing requirement has reduced does not automatically mean that the requirement in the submitted plan must be reduced. For instance, 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, maintaining the higher housing requirement in the submitted local plan would help ensure the net need of 264 affordable home for rent are delivered each year as well as meeting some of the needs, which are unspecified, for affordable home ownership products.



In addition, HBF could not find any consideration in the Council's evidence as to whether there was alignment between any economic growth aspirations of the council, and indeed its neighbouring in Cambridgeshire and the number of homes being delivered. This should have been undertaken as part of the preparation of this plan and evidence must be provided to show that a lack of housing will not, as is stated in paragraph 87 of the NPPF, be a potential barrier to investment in the area.

### Local Plan Review

HBF would also recommend that the plan 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 which states:

*“Where paragraph 226 c) applies, local plans that reach adoption with an annual housing requirement that is more than 200 dwellings lower than the relevant published Local Housing Need figure 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 West Suffolks housing needs increase from 765 dpa to 1,200 dpa and will require the council to prepare a new plan immediately. However, it is HBF's experience that without an incentive to review a recently adopted plan these are rarely undertaken 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 SS1 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 NPPF was amended in 2018 requiring the use of the Standard Method to assess housing needs. For West Suffolk HBF would therefore suggest the following policy in included in SP10 or as a separate policy.

*“Following adoption of the Local Plan, the Council will publish a new Local Development Scheme (LDS). This shall set out a timetable for the*

*preparation and submission of an updated Local Plan, which shall commence within six months of the adoption of the Local Plan with submission being no later than 30 months from date on which preparation of the updated local plan commenced. In updating its local plan, the Council will:*

- Investigate ways of addressing any changes to the calculation in the local housing needs assessment as may arise from proposed changes to the NPPF 2023, and related guidance.*
- Examine all opportunities for meeting some of the identified unmet housing needs of neighbouring authorities*

*The early review shall be conducted with the objective of securing sustainable development to meet these needs, shall review the current spatial strategy and look to provide other requisite development (including such employment development) and supporting infrastructure to meet the needs arising from this.*

*In the event that this submission date is not adhered to the policies of the local plan 2040 which are most important for determining planning applications for new dwellings will be deemed to be 'out of date' in accordance with para 11(d) of the NPPF 2023."*

### **Matter 3. Spatial strategy**

*Q3.1. Are the proposed modifications to the structure of policy SP9, and inclusion of a separate policy setting out the settlement hierarchy, necessary to make the Plan sound?*

Yes. As set out in our representations the structure of the SP9 was long winded and unwieldy. The proposed amendments improve the policy to ensure the necessary clarity required by paragraph 16 of the NPPF.

*Q3.2. Is the spatial strategy set out in the Plan appropriate, taking into account reasonable alternatives, and based on proportionate evidence? In particular:  
a) Is the settlement hierarchy of towns, key service centres, local service centres, type A villages and type B villages justified?*

b) Is the proposed distribution of new homes between the different levels in the settlement hierarchy consistent with the aim of promoting a sustainable pattern of development?

c) Does the inclusion in policy SP9 of the table summarising the distribution of new homes between the different levels in the settlement hierarchy provide a clear policy for the preparation and determination of planning applications and/or clear strategic framework for neighbourhood plans?

d) Are the approaches to growth at settlements in different levels of the hierarchy described in paragraphs 4.3.17 to 4.3.36 (including the references to “indicative maximum scheme sizes” expressed in terms of the number of homes) justified?

e) Are the strategic approaches towards development within and beyond settlement boundaries justified?

HBF is concerned that the Council have placed indicative maximum scheme sizes in certain settlement types. While the Council have stated that these are dependent on infrastructure or environmental capacity in reality this places a cap on the size of scheme that could be brought forward with no justification as to why schemes above the sizes suggested are inappropriate. Key service centres for example have a significant range of services with good access to larger towns and to suggest that such settlements cannot accommodate developments beyond 200 homes is overly restrictive. Development should be considered on their own merits in relation to infrastructure needs, environmental capacity, design etc. If these can be addressed and are consistent with other policies in the plan there is no reason why schemes above 200 homes would not be wholly appropriate in key service centres.

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## Appendix 1: Review Policy from Bedford Local Plan 2030.

### **Policy 1 - Reviewing the Local Plan 2030**

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*The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework 2019.*

*The plan review will secure levels of growth that accord with government policy and any growth deals that have been agreed. The planning and delivery of strategic growth will be aligned with the delivery of planned infrastructure schemes including the A421 expressway, Black Cat junction, East West Rail link and potentially the A1 realignment.*

*The review will also serve to build stronger working relationships with adjoining and nearby authorities and may result in the preparation of a joint strategic plan based on a wider geography.*