



Planning Policy  
Cannock Chase District Council  
Civic Centre  
Beecroft Road  
Cannock  
Staffordshire  
WS11 1BG

SENT BY E-MAIL AND POST

27<sup>th</sup> March 2017

Dear Sir / Madam

## **CANNOCK CHASE LOCAL PLAN PART 2 ISSUES & OPTIONS CONSULTATION**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following responses to specific questions set out in the consultation document.

### **Introduction**

#### **Q1. Do you have any comments in terms of any of the matters raised in this chapter?**

The purpose of the Local Plan Part 2 is site allocations and if necessary policy elaboration of the adopted Local Plan Part 1 including consideration of the District's contribution to addressing Birmingham's unmet needs by either identifying further site capacity or safeguarding land for development beyond the existing plan period. The Council is proposing to investigate the potential to provide 1,000 dwellings for Birmingham's unmet housing needs. At this time the Council has provided no evidence about the derivation of the figure of 1,000 dwellings. The Council should provide evidence to justify this figure as opposed to other alternative figures. Perhaps the Council should be investigating a range instead of a specific figure. By the time of the Local Plan Part 2 Examination the Council together with the other thirteen Greater Birmingham Housing Market Area (GBHMA) authorities will be required to provide a Statement of Common Ground setting out cross boundary working

as proposed in the recently published Housing White Paper “Fixing The Broken Housing Market”.

The Housing White Paper sets out the Government’s intention to introduce a standard methodology for the assessment of housing needs and a housing delivery test. There is also a proposal that Local Plans are kept up to date with regular reviews at least every five years. From April 2018 the standard methodology for the assessment of housing needs will be used as the baseline for the calculation of 5 YHLS and the delivery test in the absence of an up to date Local Plan (by the Government’s definition a Plan that is less than 5 years old). The Cannock Chase Local Plan Part 1 was adopted in June 2014 so beyond mid 2019 the Plan would be deemed to be out of date. The Council’s proposal to review the Local Plan Part 1 after the adoption of the Part 2 Plan means that for a period of time post mid 2019 the 5 YHLS and delivery test would be calculated against the standard methodology for assessment of housing needs. The Council should give consideration to the future implications of these Government proposals.

### **Links between LPP1 and LPP2**

**Q1. Do you have any comments in terms of any of the matters raised in this chapter?**

Our comments on the links between the Local Plan Parts 1 & 2 and whether or not further policy elaboration is required are covered by our responses to other specific questions as set out in this correspondence.

### **Approach to Allocations and Standards**

**Q1. Do you have any comments in terms of any of the matters raised in this chapter?**

The HBF do not make representations on specific sites or the assessment thereof.

### **Green Belt Issues**

**Q1. Do you have any comments on the issues raised in this chapter?**

The HBF query the significance placed on the impact on landscape character in the Council’s Green Belt assessment.

### **Housing Supply Issues (links to LPP1 Policy CP6 - Housing Land)**

**Q1. Are there any issues or sites that we haven’t considered which need to be addressed?**

When allocating sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. The Council should also refer to

the Housing White Paper which emphasises the importance of a wide range of sites. A good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

The HBF would recommend as large a contingency as possible for both the 5 YHLS and overall HLS especially given that the housing requirement is a minimum not a maximum figure. The HBF always suggests a 20% contingency to provide sufficient flexibility for unforeseen circumstances.

### **Issue H1: Which sites should be considered for allocation for residential development in the LPP2 to meet current requirements?**

In allocating residential sites to meet current housing requirements the HBF suggest that the Council considers a hybrid approach based on Option H1a but also including any large sites on which existing planning consents have lapsed.

### **Issue H2: Should the Council adopt site specific standards to help guide the development of allocated sites?**

With regards to the adoption of site specific standards the HBF's preferred option is H2a so that there are no site specific policy standards / requirements but existing Local Plan Part 1 policies and Design SPD guidance are relied upon.

### **Issue H3: How can the Council support the development of small and windfall sites further?**

The HBF preference is Option H3a which means not developing further policies but relying on existing policies within the Local Plan Part 1 to support small scale and self-build developments. The HBF is supportive of positive policy approaches to small scale development such as investigating opportunities for custom build dwellings on Council owned land as and when it becomes available for redevelopment / disposal. However the HBF would object to any imposed requirement to provide a proportion of self-build plots on larger allocated sites.

### **Issue H4: To what extent should the District cater for longer term needs and how can the need be best met?**

The Council proposes to identify safeguarded land from the Green Belt for up to 5% of the District's current housing requirement for beyond the plan period. There is no evidence about the derivation of the figure of 5%. It is suggested that this figure is too low. How has the long term housing need been assessed as 5% of the current housing requirement? Even when combined with the Council's identified surplus of 11% and the residential potential at Rugeley Power Station the Council's proposal is below the Local Plans Expert Group's (LPEG) recommendation which proposed that "*the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the*

*medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF” (para 11.4 of the LPEG Report). All options should be considered including assessing the suitability of increasing the capacity of existing safeguarded land as well as other Green Belt sites. If the Council identifies insufficient safeguarded land then there is an increased risk that Green Belt boundaries will not endure.*

**Issue H5: How should the plan take account of the housing supply shortfall arising within the Greater Birmingham Housing Market Area?**

The HBF’s preferred Option is H5c for a combination of providing for some additional dwellings within the District via the Part 2 Plan to help meet the GBHMA housing supply shortfall and a commitment to further provision via the review of the Local Plan Part 1. However the quantum should be justified (see answer to Introduction Q1). The HBF note that the Council cannot fulfil an early review as proposed under Option H5b because it is already failing to undertake a first review of the Local Plan Part 1 in the at least 5 yearly review timescale proposed in the Housing White Paper (see answer to Introduction Q1).

**Issue AH1: How should the Council address the need to take into account the most recent changes affecting the nature of affordable housing delivery?**

The Housing White Paper proposes that the Council can deliver Starter Homes as part of a mixed package of affordable housing alongside other affordable home ownership and rented tenures. The appropriate level of provision for the locality determined by the Council in agreement with developers. The HBF considers that a combination of Options AH1a and AH1b is the most appropriate approach which combines a review of Policy in the Local Plan Part 1 review and an update of the Council’s SPD. However any proposed changes would have to be supported by evidence and viability tested.

**Conclusion**

It is hoped that these responses will assist the Council in informing the next stages of the Cannock Chase Local Plan Part 2. In the meantime if any further information or assistance is required please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



**Susan E Green MRTPI**  
**Planning Manager – Local Plans**