

Home Builders Federation

Matters 8

CENTRAL BEDFORDSHIRE LOCAL PLAN EXAMINATION

Matter 8 – Meeting Housing Needs (Policies H1-H7)

Issue 1 – Housing Mix – Policy H1

Q1. Is it clear to decision-makers, developers and local communities what is required under Policy H1? Is the policy effective?

The HBF expects flexible policies with regard to the type and size of market housing to be provided on site. House builders are best placed to understand the market for housing in an area and the homes the people want to buy, and Council's should provide the framework within which they can meet those needs not dictate borough wide needs on a site by site basis. However, we recognise that the Council is required by national policy to provide a mix of homes across and that development across the area should cumulatively ensure that this mix is broadly delivered.

But policy H1, provides neither advice nor flexibility as it requires all new developments, regardless of size, to provide a mix of housing but leaves it up to the applicant to assess this mix using the evidence set out in paragraph 11.1.3. We would therefore suggest that some guidance is required within the supporting text to support both the applicant and decision maker understand the broad mix the Council is seeking to achieve. We would also suggest the requiring all site to provide a mix of housing to be ineffective. The mix on many smaller sites will be determined by the location and nature of the site and as such it is unlikely to achieve the mix of homes required and will just delay delivery in order negotiate the mix on such sites. The Council should therefore amend H1 to require only major development to consider the mix of housing to be provided.

Q2. How does Policy H1 take into account site specific circumstances, such as the density and character of an area, or viability, in determining the mix of house types in new developments?

The policy must be clear that viability will be a key concern when delivering the mix of homes. The type and size of market homes to be provided can have a significant impact on the viability of a development and the ability to meet other policy



requirements. Flexibility to alter the mix of market homes in order to secure a viable development is therefore essential and should be included in the policy.

Q3. As submitted will Policy H1 deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities as required by paragraph 50 of the Framework?

The HBF considers the most effective approach to ensuring a mix of housing is to allocate a wide variety of sites both in terms of size and location. Different sites delivered by a range of house builders will inevitably deliver a better mix of housing and for this reason policies such as H1 should outline the Council's ambition with regard to housing mix rather than state the precise mix for all housing sites. Such an approach, if coupled with the allocation of a range of sites will ensure an appropriate mix of housing comes forward across the Borough whilst also allowing the market to determine the type of housing provided on each site.

Issue 2 – Housing Standards - Policy H2

Q1. The PPG states that local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. In doing so local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local Plans. Has this been carried out? What is the justification for the standards in Policy H2?

It is incumbent on the Council to set out the evidence to justify the inclusion of the optional technical standards. Contrary to our representation we note that further evidence on the need for more accessible housing to that set out in the local plan itself is provided in the 2017 SHMA. This evidence suggests the requirement 35% of new homes should be provided to part M4(2) is justified on the basis of needs.

However, we are concerned that this may be overestimating the level of need. The Council's evidence states that around 8,810 households in Central Bedfordshire will have an individual health problem that affects their housing requirement, but it is noted that this includes households whose illness or disability affects their housing needs but consider their current home to be suitable. If their current home is suitable then this would indicate that their needs have been met through the existing housing stock and should not be included in future estimates of need. Therefore, the number of existing households that the Council estimates need to move as a result of long-term health problem or disability is much lower at 720 households – about 2.5% of households which include a person with a disability or long-term illness. Applying this proportion to the Council's estimates of the likely growth of households including one or more person with a long-term health or disability in future the evidence would suggest that nearly 400 additional households would need to move to a more suitable home. With existing needs this amounts to 1,120 households needing to move to a more suitable home –

roughly 3.5% of the Council's OAN. If those who also require adaptations to their current homes are also included this figure increases to 2,277, about 7% of the OAN.

Given the Council's estimates that a significant proportion of those households including at least one person with a long term illness or disability already lives in a home suitable for their needs it could be suggested that homes built to part M4(1) are likely to be sufficient to meet their needs and that a much smaller proportion of new homes are required to be built to part M4(2).

The impact of this policy has been considered in the viability study and whilst this suggest that the policy will not impact on the viability of development, we are concerned that there will be sites where the delivery of this policy alongside other costs will have an impact on the viability of development. We would therefore suggest that in order to ensure that the policy is sufficiently flexible, and in line with paragraph 56-010-20150327, that the following sentence is included in the policy.

"Where it can be shown that development is made unviable by the delivery of these standards the Council will not apply this policy."

Whilst evidence has been provided in relation to the need for part M4(2) we could not find any evidence regarding the need for the nationally described space standards (NDSS). PPG is clear that the adoption of these standards should be based on the need for such homes and the potential impact on viability and affordability of new homes in an area. Without the necessary evidence the Council cannot justify the adoption of national described space standards.

The standards could, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. This could lead to a reduction in housing delivery, and potentially reduce the quality of life for some residents. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. However, without the necessary evidence the Council has not been able to consider the potential impacts as required by PPG the adoption of the NDSS cannot be justified. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market.

Q2. The PPG also states that local planning authorities should consider the impact of using optional Building Regulation requirements and the nationally described space standards as part of their Local Plan viability assessments. Has this been carried out? Have the standards in Policy H2 been tested to ensure that new residential development will remain viable?

See above

Q3. Is Policy H2 consistent with guidance contained in the PPG, which makes the distinction between wheelchair accessible dwellings (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable dwellings (a home that can be easily adapted to meet the needs of a household including wheelchair users)?

The policy at present does not make the distinction required by PPG between wheelchair adaptable and wheelchair accessible housing. If the Council's intention is to provide wheelchair accessible homes, it must be noted that these can only be required in relation to homes where the local authority is able to allocate or nominate a person able to live in that home. The Council must be clear within this policy as to its intentions.

Issue 3 – Housing for Older People – Policy H3

Q1. Is it clear to decision-makers, developers and local communities what is required under Policy H3? Is the policy effective? And Q2. What is the justification for requiring bungalows, level access accommodation or low-density flats to be provided for older people on developments of 100 dwellings or more? What is the threshold based on?

It is not clear as to what the Council's intentions are with regard to what is required of applicants in this policy. For example, bullet point 3 on mix and tenure of such accommodation provides no clarity on what is needed and how this relates to policy H1 on housing mix and H4 on affordable housing both of which consider the type of homes required and the tenure mix. We also object to the inclusion of bullet points 6 and 7 which requires specific types of development to meet the needs of older people. House builders will provide level access accommodation as part of the requirements of Part M of the Building Regulations and will provide a mix of homes where appropriate. However, market homes would be provided for anyone to live in and it would therefore be inappropriate to restrict the occupancy of these dwellings to a certain age group. It is also inappropriate to require the provision of bungalows. Whilst there may be a preference to live in a bungalow, they are an inefficient use of land. As such they can reduce the capacity of the site and impact on its viability. We therefore consider the sixth and seventh bullet points in policy H3 to be neither justified nor effective and should be deleted.

Issue 4 – Affordable Housing – Policy H4

The Council must delete the reference to future revision of the NPPG or case law relating to the provision of affordable housing. Any amendment to the policy should only be made via a review of the local plan.

Issue 7 – Self and Custom Build Housing – Policy H7

Q1. What is the current demand for self and custom-build housing in Central Bedfordshire? How does Policy H7 relate to the identified need?

The HBF are concerned that across the Country the level of need outlined on self-build registers could be inflated and does not reflect demand and the financial ability of some of those on the list to become self-builders. Very little work has been undertaken by Councils to review these registers to ensure that they are a true reflection of the demand for such homes. We have noted that when Councils have revisited their registers in order to confirm whether individuals wish to remain on the register numbers have fallen significantly. This has been the case at the EIP for both the Hart and Runnymede Local Plans. In Runnymede for example more stringent registration requirements were applied in line with national policy and saw the numbers of interested parties on the register fall from 155 to just 3. We could not find any evidence as to whether CBC has revisited its self-build register since its introduction to examine whether those individuals on the list are still interested in, or have a realistic prospect of, building their own home or whether their housing needs have been met through the market. There is the risk that unless this process has been undertaken the Council will not have a realistic understanding of demand for self-build plots within the District.

Q2. What is the threshold of 10 or more dwellings based on, and what is the justification for requiring 20% of the dwelling capacity to be provided as serviced plots?

We could find no justification for the threshold of 10 units and we could not find any evidence from the Council as to how many plots will be provided through this policy if the 20% threshold is applied in all cases. Whilst the Council have stated that this is the maximum they will be seeking to achieve and that provision will be negotiated on a site by site basis we would suggest that a more appropriate approach would be for the Council to consider its own land or work with landowners to identify sites that could be allocated for the delivery of self-build plots rather than place the entire burden on the house-building industry. A more proactive approach is clearly more in line with Government guidance on this issue which focusses on engaging with landowners to identify appropriate sites rather than requiring plots to be provided on by the housing building industry for self-builders with paragraph 57-025 of PPG stating:

Relevant authorities should consider how they can best support self-build and custom housebuilding in their area. This could include:

- *developing policies in their Local Plan for self-build and custom housebuilding;*
- *using their own land if available and suitable for self-build and custom housebuilding and marketing it to those on the register;*
- *engaging with landowners who own sites that are suitable for housing and encouraging them to consider self-build and custom housebuilding and facilitating access to those on the register where the landowner is interested; and*
- *working with custom build developers to maximise opportunities for self-build and custom housebuilding.*

Many of our members will be able to assist the custom build sector either through the physical building of dwellings on behalf of the homeowner or through the provision of plots for sale to custom builders. The HBF are, therefore, not opposed to the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. However, the Council 's approach at present has focussed on just one aspect of the guidance without sufficiently examining the other approaches that would potentially deliver more homes rather than just changing who builds that house. It is therefore not justified to place such a high requirement on so many sites.

Q3. Is it clear to decision-makers, developers and local communities exactly how many serviced plots are required?

It is not clear how many plots are required and that will make it difficult for both applicants and decision makers to know what is expected of them given that this provision will be negotiated on a site by site basis. Such uncertainties will lead to more negotiation and slower decisions – two elements the Government is seeking to reduce in the planning process through the 2019 NPPF.

Mark Behrendt MRTPI
Planning Manager – Local Plans SE and E