

Planning Policy & Land Charges Team,
North West Leicestershire District Council,
PO Box 11051,
Coalville,
LE67 0FW



SENT BY EMAIL
planning.policy@nwleicestershire.gov.uk
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Dear Planning Policy Team,

DRAFT NORTH WEST LEICESTERSHIRE LOCAL PLAN 2020-2040: PROPOSED POLICIES FOR CONSULTATION & PROPOSED HOUSING AND EMPLOYMENT ALLOCATIONS FOR CONSULTATION

1. Thank you for consulting with the Home Builders Federation (HBF) on the Draft North West Leicestershire Local Plan 2020-2040: Proposed Policies for Consultation & Proposed Housing and Employment Allocations for Consultation.
2. 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.
3. The HBF would like to submit the following comments upon selected policies within these consultation documents. These responses are provided in order to assist North West Leicestershire Council in the preparation of the emerging local plan. The HBF is keen to ensure that the Council produces a sound local plan which provides for the housing needs of the area.
4. The HBF notes that Council's caveat that this document was prepared prior to the revisions made to the NPPF on 20th December 2023, and that any reference to the NPPF is to the previous version and will be corrected at the next stage of the Plan.

Plan Period

5. The proposed plan period is 2020 to 2040. The HBF considers that this is unlikely to be appropriate as the NPPF¹ states that strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery. The HBF considers it is unlikely that that this Plan would be adopted in 2025.

¹ NPPF December 2023 Paragraph 22



Objectives

6. One of the Council's objectives is to ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of number, size, tenure and type. This is generally supported by the HBF.

Draft Policy S1 – Future Development Needs (Strategic Policy)

7. This policy states the housing requirement for North West Leicestershire is 686 dwellings each year, and 13,720 dwellings over the plan period 2020-204. The Plan states that the standard method identifies a housing need of 372 dwellings per annum (dpa). It also identifies circumstances when it might be appropriate to plan for a level above the housing need figure, this includes meeting unmet demand from a neighbouring authority. The Plan states that Leicester City Council declared that it had an unmet, but unquantified, need in 2017. A Leicester and Leicestershire Housing and Economic Needs Assessment (HENA) was undertaken having regard to a range of factors to inform how this unmet need might be redistributed across the rest of Leicestershire. This work resulted in a significant increase in the need for housing to 686dpa. This work led to a Statement of Common Ground which has been signed by the Council.
8. The NPPF² states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method set out in the PPG. The PPG sets out the method for calculating the minimum annual local housing need figure³. The PPG⁴ also sets out when it might be appropriate to plan for a higher housing need figure than the standard method, these include where there are growth strategies for the area, where there are strategic infrastructure improvements, where an authority is taking unmet need from a neighbouring authority, and where previous levels of housing delivery, or previous assessments of need are significantly greater than the outcome from the standard method.
9. The HENA has calculated the minimum local housing need (LHN) using the standard method for North West Leicestershire at 372dpa, it also identifies the minimum LHN for Leicester at 2,464dpa. The HENA also considers the balance between homes and employment, it suggests that there is stronger relative employment growth in North West Leicestershire with Cambridge Econometrics (CE) baseline projections highlighting a 7.3% change in jobs between 2020 and 2036. Table 8.3 compares jobs growth supported by the Standard Method against the CE baseline projections this highlights that for North West Leicestershire the standard method would not provide enough homes to meet the employment need. The HENA suggests that between 391 and

² NPPF December 2023 Paragraph 61

³ PPG ID:2a-004-20201216

⁴ PPG ID: 2a-010-20201216

418dpa would be required to meet the baseline projections, and that between 535 and 589dpa would be required to meet the aspirational growth scenario.

10. The HENA Housing Distribution Paper suggests that difference between Leicester’s LHN and their supply generates an unmet need for Leicester of around 18,700 dwellings to 2036, equivalent to 1,169dpa. The paper considers redistribution based on the functional relationship to Leicester, adjustments to support future economic growth, implied stock growth, adjustments to support deliverability and to manage commuting and adjustments based on the current plan provision and land supply. This has led to the paper proposing a housing requirement 686dpa for North West Leicestershire.
11. The HENA has identified annual need for social / affordable rented housing of 236dpa and for affordable home ownership of 146dpa. It is noted that the PPG⁵ 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, the HBF considers that the Council should also be taking this affordable housing requirement into consideration as part of their housing requirement.
12. Table 1 below shows that the net additional dwellings in North West Leicestershire over the last ten years have regularly been above the LHN and the proposed housing requirement, with an average delivery over the ten years of 743dpa.

Table 1: Net additional dwellings⁶											
	2013 / 14	2014 / 15	2015 / 16	2016 / 17	2017 / 18	2018 / 19	2019 / 20	2020 / 21	2021 / 22	2022 / 23	Average
North West Leicestershire	403	670	814	823	943	685	726	674	987	706	743

13. The HBF considers that the Council should review the housing requirement to ensure that it reflects the local housing need identified by the standard method and gives further consideration to the circumstances where a higher figure would be appropriate, particularly given the evidence highlighted above.

Draft Policy S2 – Settlement Hierarchy (Strategic Policy)

14. This policy sets out the settlement hierarchy from Principal Town including the Coalville Urban Area; Key Service Centres including Ashby de la Zouch and Castle Donington; new settlement at Isley Woodhouse; Local Service Centres including Ibstock, Kegworth and Measham, Sustainable Villages including Albert Village, Appleby Magna, Belton, Blackfordby, Breedon on the Hill, Diseworth, Donisthorpe, Ellistown, Heather, Long Whatton, Moira (including Norris Hill), Oakthorpe, Packington, Ravenstone, Swannington, Woodville, Worthington, Local Housing Needs Villages including Battram, Boundary, Coleorton, Griffydham, Hemington, Lockington, Lount, Newbold, Newton

⁵ PPG ID: 2a-024-20190220

⁶ DLUHC Housing Supply: Net Additional Dwellings – live tables
(<https://www.gov.uk/government/collections/net-supply-of-housing#live-tables>)

Burgoland, Normanton le Heath, Osgathorpe, Peggs Green, Sinope, Snarestone, Swepstone, Wilson; and to, finally, Small Villages or Hamlets in the countryside.

15. The HBF considers that it is important that the spatial distribution of sites follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas. The HBF considers that the Council's proposed approach to the distribution of housing should ensure the availability of a sufficient supply of deliverable and developable land to deliver the housing requirement.

Draft Policy AP4 – Reducing Carbon Emissions (Strategic Policy)

16. This policy states that all new development will be required to demonstrate how they will achieve energy efficiency targets in line with the latest standards at the time a planning application is determined; and demonstrate that measures have been taken to minimise energy consumption by following steps in the energy hierarchy and major developments will be required to demonstrate that measures have been taken to reduce lifecycle carbon emissions and maximise opportunities for the reuse of materials. It also states that renewable energy generation should be maximised as much as possible on site.
17. The HBF supports the Council in seeking to meet the challenge of reducing carbon emissions. The HBF considers that the Council should ensure that this policy is only implemented in line with the December 2023 Written Ministerial Statement⁷ which states that 'a further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes'. It goes on to state that 'the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale'. The HBF considers as such it would be appropriate to make reference to the Future Homes Standard and the Building Regulations as the appropriate standards for development. The Council will also be aware that the Future Homes and Buildings Standards: 2023 consultation⁸ has been released covering Part L (conservation of fuel and power), Part F (ventilation) and Part O (overheating).

Draft Policy AP5 – Health and Wellbeing (Strategic Policy)

⁷ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123>

⁸ <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

18. This policy states that the Council will support healthy eating and promote healthy food choices through opportunities for sustainable food development, such as allotments and community growing places.
19. The HBF generally supports plans that set out how the Council will achieve improvements in health and well-being. In preparing its local plan the Council should normally consider the health impacts with regard to the level and location of development. Collectively the policies in the plan should ensure health benefits and limit any negative impacts and as such any development that is in accordance with that plan should already be contributing positively to the overall healthy objectives of that area.

Policy AP6 – Health Impact Assessments

20. The Council have not yet drafted a policy in relation to Health Impact Assessments (HIAs), the Plan suggests that the Council will be exploring triggers for HIA, including the potential for an identification of a numerical threshold, or geographical areas where there are issues surrounding health inequality or vulnerability.
21. The PPG⁹ sets out that HIAs are ‘a useful tool to use where there are expected to be significant impacts’ but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Consequently, where a development is in line with policies in the local plan a HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring a HIA. In addition, the HBF considers that any requirement for a HIA should be based on a proportionate level of detail in relation the scale and type of development proposed. The requirement for HIA for development proposals that meet a particular numerical threshold without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the PPG. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to substantially mitigate the impact.

Draft Policy AP9 – Water Efficiency

22. This policy states that all proposals for new residential development are required to achieve the national optional water efficiency standard of a maximum of 110 litres of water per person per day.
23. The HBF notes that the Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. The Optional Technical Housing Standard is 110 litres per day per person.

⁹ PPG ID:53-005-20190722

24. As set out in the NPPF¹⁰, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. Therefore, a policy requirement for the optional water efficiency standard must be justified by credible and robust evidence. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the PPG. PPG¹¹ states that where there is a *'clear local need, Local Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day'*. PPG¹² also states the *'it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement'*. The HBF does not consider that the Council's evidence demonstrates a clear local need.

Draft Policy H1 – Housing Strategy (Strategic Policy)

25. This policy states that the Council will plan, monitor and manage the delivery of housing development. The policy also states that the annualised housing requirement for five-year housing land supply and housing trajectory purposes will be 686dpa.
26. The HBF generally supports the clarity provided by the Council in identifying 686dpa as the housing requirement which will be used for the five year housing land supply (5YHLS) and the housing trajectory.
27. This policy also states that proposals for residential development will be supported where they contribute positively towards meeting local housing needs and achieving sustainable development. And goes on to state that applications for major development should demonstrate how they will make an optimal use of land and provide a mix of homes, including size, tenure and specialist adaptations to support people with different needs.
28. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements, requiring a mix that does not consider the scale of the site or the need to provide significant amounts of additional evidence.
29. The policy makes reference to major residential developments demonstrating how they will make optimal use of land; however, the policy does not set a density requirement. The NPPF¹³ states that plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible . . . and should

¹⁰ NPPF Sept 2023 paragraph 31 / NPPF Dec 2023 paragraph 31

¹¹ ID: 56-014-20150327

¹² ID: 56-015-20150327

¹³ NPPF Dec 2023 paragraph 129

include the use of minimum density standards for city and town centres and other locations that are well served by public transport.

30. The HBF considers that the Council should ensure that the policy is in line with the NPPF, but also ensure that it includes a level of flexibility. The HBF would recommend clarity around the term optimal use of land and would recommend amendments to create flexibility within the policy to allow developers to take account of individual site characteristics and evidence in relation to demand, market aspirations and viability.
31. However, the HBF considers that much of this policy is more of a statement of intent than a policy and much of what it contains is already found in other policies. The HBF considers this policy could be streamlined or deleted, with a more general set of principles set out in the introduction of the housing section of the Plan.

Draft Policy H4 – Housing Types and Mix

32. This policy states that planning applications for major residential and mixed-use schemes should provide a mix of housing types and sizes including custom and self-build. It states that the dwelling size breakdown in the HENA is the starting point and a table, copied below, sets out the proportions. It suggests that any deviation of more than 5% must be justified.

	1-bed	2-bed	3-bed	4-bed
Market	5%	35%	45%	15%
Affordable for Rent	35%	40%	20%	5%
Affordable Ownership	15%	40%	35%	10%

33. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements, requiring a mix that does not consider the scale of the site or the need to provide significant amounts of additional evidence.
34. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. The HBF also recommends that the evidence required to support the housing mix is proportionate to the development and is not overly onerous.

35. The HBF would be keen to understand the evidence to support the need for custom and self-build housing in North West Leicestershire, and how it has informed the requirements of this Policy. The PPG¹⁴ sets out how custom and self-build housing needs can be assessed. The HENA identifies that on average 13 individuals enter the register per base period within North West Leicestershire. The Self-Build Topic Paper suggests that as of 30th October 2023, there are 126 individuals on the Council's register. The Topic Paper also sets out that the Council have granted planning permission for 37 self-build and custom housebuilding plots, with a further 7 granted permission on the 1APP form.
36. The HBF is concerned that as currently proposed this policy will not assist in boosting the supply of housing and may even limit the deliverability of some sites and homes. The HBF considers that the Council's own evidence show that there is not a demand from custom and self-builders. The PPG¹⁵ sets out how local authorities can increase the number of planning permissions which are suitable for self and custom build housing. 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 allocation of small and medium scale sites specifically for self & custom build housing and permitting self & custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.
37. Additionally, the policy states that developments which include housing suitable for older people will be supported. For schemes of 50+ dwellings a proportion of the 1 and 2 bed homes should be in the form of bungalows or other single level housing.
38. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. Whilst there is general support for such development, the HBF would recommend that the Council should be more proactive in working with providers of this type of development to identify appropriate sites for allocation. This approach would provide far more certainty to the council that the need for such accommodation will be met in full. The HBF also considers that it is important that the Council consider the implications of the provision of bungalows and other single level housing in terms of viability and density.

Draft Policy H5 - Affordable Housing (Strategic Policy)

39. This policy states that affordable housing will be provided on site as part of major residential and mixed-use developments. However, the percentage requirements and tenure mix have not yet been set and are awaiting whole plan viability testing.
40. The HBF supports the need to address the affordable housing requirements of the borough. However, given the limited information provided in relation to this policy, the

¹⁴ PPG ID: 67-003-20190722

¹⁵ PPG ID: 57-025-20210508

HBF is not able to comment in detail. The NPPF¹⁶ is clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery.

Draft Policy H7 – Self-build and Custom housebuilding

41. This policy states that on general market housing sites of 30 or more the Council will require the delivery of a minimum of 5% of the sites capacity as serviced plots for self-build and custom housebuilding.
42. The HBF does not consider that the Council has appropriate evidence to support the requirement for developers on sites of 30 dwellings or more to provide 5% of all new homes as service plots for custom or self-build housing. The HBF is concerned that as currently proposed this policy will not assist in boosting the supply of housing and may even limit the deliverability of some sites and homes. The HBF considers that the Council's own evidence show that there is not a demand from custom and self-builders.
43. The HBF has previously set out its concerns in relation to self and custom build in Policy H4, and as such has not repeated them here. However, it seems unnecessary for both policies to contain this requirement, and the HBF would suggest that the requirement could be removed from H4, to avoid unnecessary duplication.

Draft Policy H10 – Space Standards

44. This policy states that all new housing will be required to meet or exceed the Nationally Described Space Standards (NDSS).
45. The NDSS as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. PPG¹⁷ identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas: Need, Viability and Timing. The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.
46. The Space Standards Topic Paper states that there is evidence that the majority of one, two and three bed homes do not meet the minimum gross internal floorspace standards as set out in the NDSS. The Topic Paper does not provide evidence that these homes have not sold or do not meet the needs of the residents of these homes. The HBF considers that in most circumstances home buyers in this country purchase homes

¹⁶ NPPF Dec 2023 Paragraph 34

¹⁷ PPG ID:56-020-20150327

based on the numbers of bedrooms meeting their needs, rather than the floorspace of the property. The HBF considers that the Council may want to consider the implications any increase in floorspace may have on the cost of the properties in their area, and the implications this may have for local residents.

Draft Policy H11 – Accessible, adaptable and wheelchair user housing

47. This policy states that all new homes will be required to meet Part M4(2) and that on housing developments of 10 or more dwellings or on sites of more than 0.5ha at least 9% of all market homes will be required to meet Part M4(3)(2)(a), and at least 23% of all affordable homes will be required to meet Part M4(3) and that the expectation is that these will be built to M3(3)(2)(b) standard (wheelchair accessible dwellings), although provision of M4(3)(2)(a) (wheelchair adaptable dwellings) will be considered where justified and agreed with the Council's Strategic Housing Team prior to the granting of planning permission.
48. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG.
49. PPG¹⁸ identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for North West Leicestershire which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommends that an appropriate transition period is included within the policy.
50. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, this is not just in relation to the ability to provide step-free access.
51. The Council should also note that the Government response to the Raising accessibility standards for new homes¹⁹ states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy in place and where a need has been identified and evidenced.

¹⁸ PPG ID: 56-007-20150327

¹⁹ <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response#government-response>

52. The HBF considers that if the Council has the evidence to introduce this policy, it may want to consider the most appropriate way to deliver the homes they require to meet their needs. The HBF considers that this may not always be in the form of M4(3) homes, and may need further consideration.

Draft Policy IF1 – Development and Infrastructure (Strategic Policy)

53. This policy states that contributions may be secured by means of planning obligations and / or community infrastructure levy charges. It goes on to state that in negotiating the provisions of infrastructure the Council will have due regard to viability issues and where appropriate will require that the applicant provide viability information to the Council which will then be subject to independent verification.
54. Development can only be required to mitigate its own impact and cannot be required to address existing deficiencies in infrastructure or services. It is therefore essential for the Infrastructure Development Plan (IDP) to clearly show the existing and known deficiencies in the current infrastructure, before reaching any conclusion on the cumulative effects of new development, and any contribution that is needed from new development to mitigate any additional individual and/or cumulative impacts.
55. The HBF notes the flexibility in relation to the Council having regard to viability issues, however the HBF also suggests that the policy wording should include the opportunity for negotiation around policy requirements for site specific reasons, to reflect any viability challenges identified in the Plan Viability Assessment and for any sites whose circumstances fall outside the parameters of the typologies tested.

Draft Policy EN2 – River Mease Special Area of Conservation (Strategic Policy)

56. This policy states that until such time as wastewater is pumped out of the River Mease catchment, new development will be allowed where there is sufficient headroom capacity available at the named Wastewater Treatment Works (WWTW) and the proposed development is in accordance with the provisions of the Water Quality Management Plan.
57. The Notice of Designation of Sensitive Catchment Areas 2024²⁰ identifies the River Mease SAC as a phosphorus sensitive catchment area. The notice identifies that *'in designated catchments water companies have a duty to ensure wastewater treatment works serving a population equivalent over 2,000 meet specified nutrient removal standards by 1st April 2030. Competent authorities (including local planning authorities) considering planning proposals for development draining via a sewer to a wastewater treatment works subject to the upgrade duty are required to consider that the nutrient pollution standard will be met by the upgrade date for the purposes of Habitats Regulations Assessments. A limited exemption process will be completed by 1 April 2024, when wastewater treatment works exemptions will be confirmed, which may affect the levels of nutrient mitigation that development must secure for specific wastewater*

²⁰ <https://www.gov.uk/government/publications/notice-of-designation-of-sensitive-catchment-areas-2024/notice-of-designation-of-sensitive-catchment-areas-2024#effect-of-this-notice>

treatment works in some catchments. It is important that planning decisions continue to be taken based on material planning considerations'.

58. The HBF would also suggest that the Council may want to further consider the role of the water industry in the protection of water resources and nutrient neutrality. This policy places a lot of emphasis on the development industry to protect water quality, to ensure water resources, to protect the environment and to create nutrient neutrality, whereas most of the actual responsibility for these elements will be reliant on the work of the water industry.

Housing Allocations

59. Table 2 of the Allocations Consultation Document, copied below, sets out the housing need and supply position at April 2023, and suggests that there is a need to allocate around 5,693 dwellings.

Table 2: Housing Need and Supply Position at 1 April 2023

		No. of dwellings
A	Annual requirement	686
B	Total requirement 2020-40 (A x 20)	13,720
C	Completions 1 April 2020 - 31 March 23	2,396
D	Remaining at 1 April 2023 (B - C)	11,324
E	Flexibility allowance @ 10% of D	1,132
F	TOTAL REQUIREMENT (D +E)	12,456
G	Projected completions 2023-31	4,698
H	Projected completions 2031-40	1,388
I	Projected additional completions due to HS2	677
J	Total projected completions 2022-40 (G+H+I)	6,763
	REMAINING PROVISION REQUIRED (F - J)	5,693

60. The Housing Allocations document sets out the draft housing allocations, the table summary of allocations does not appear to have a policy number.
61. The HBF has no comments on the individual proposed housing allocations and these representations are submitted without prejudice to any comments made by other parties. The HBF is keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members

can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue.

62. The Plan's policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver South Tyneside's housing requirement. This sufficiency of housing land supply (HLS) should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (YHLS), and achieve Housing Delivery Test (HDT) performance measurements. The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites and to provide flexibility and choice within the market. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.
63. The Council's overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market.
64. The Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements.

Monitoring

65. The HBF recommends that the Council include an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported, this should also include the targets that the Plan is hoping to achieve and actions to be taken if the targets are not met. The HBF recommends that the Council provide more details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.

Viability

66. The HBF has not been able to find an up-to-date Viability Assessment. The HBF considers that a viability assessment will need to be prepared to reflect the current Plan policies and requirements and the current costs. Without this part of the evidence, the

HBF is not able to comment on the deliverability of the policy requirements or the Local Plan overall.

Future Engagement

67. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

68. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours faithfully

A handwritten signature in blue ink that reads "R. H. Danemann".

Rachel Danemann MRTPI CIHCM AssocRICS
Planning Manager – Local Plans (Midlands and South West)
Home Builders Federation
Email: rachel.danemann@hbf.co.uk
Phone: 07817865534