Cornwall Council,

FAO. Planning Policy Team,

New County Hall,

Treyew Road,

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SENT BY EMAIL

localplan@cornwall.gov.uk

 07/02/2025

Dear Planning Policy Team,

**Re: Cornwall Interim Planning Policy Statement (IPPS)**

Thank you for consulting the HBF on the Cornwall IPPS.

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 note that the four-week consultation period for this important ‘policy’ document is very short.

Although there are some elements of the IPPS that HBF welcome, we are concerned by the inconsistencies and contradictions within the document. It would appear that although the Council acknowledges the pro-growth agenda, the deficiencies of its out-of-date Local Plan, and its failure to plan for enough homes in Cornwall, the IPPS is still an attempt to control and restrict new development in the County, contrary to the stated ambitions of the new NPPF which seek to create a step change in housing delivery nationwide.

Although the Council’s intention to support the plan-led system and provide support for the house building industry during this time of transition are well-meant, HBF would suggest this IPPS is not what is needed. We are concerned that the Council is trying to use the IPPS to guard against and resist speculative applications, rather than seeking to shape new development. We would advocate for alternative and more collaborative ways to help positively shape new development in Cornwall.

HBF believe the focus of the Council’s efforts to address the policy vacuum created by an out-of-date Local Plan should not be limited to the decision-making process part of housing delivery. The Council should be working proactively with the industry before applications are submitted through making better use of the developer forum to show the Council is open for business for new high-quality housing developments, and through site specific pre-application advice (more than half an hour would be needed). HBF would welcome a more detailed Position Statement from the Council that sets out how they will engage with industry to help deliver the step change in housing required by the new NPPF standard method figures, sadly the IPPS does not do this.

HBF are very concerned that rather than setting out what the Council will do to enable housing growth, the interim policy statement is in fact an effort by the Council to challenge and undermine the pro-growth and pro-housing growth agenda signalled by the new NPPF. We do not agree with the assessment set out in Appendix B of this document, in particular attempts to restrict the location of new development. To deliver a step change in housing growth in Cornwall development in other locations will be needed, and soon.

Proposals which seek to bring forward new housing development in Cornwall, can not and should not be viewed as premature to a Local Plan, especially as the lack of a Local Plan that is less than five year old is the consequence of the Council’s decision to ‘review’ its Plan, conclude (in the HBF’s view erroneously) that it is still up to date, and not begin work on a new one. An approach that the HBF does not support. HBF have long been critical of the ability of Councils’ to ‘mark their own homework’ through the Local Plan review process, especially as there is no public consultation or feed-in from stakeholders to this process.

HBF agree with the Council that the new standard method calculations are a new minimum level of housing growth that needs to be planned for in new Local Plans. We agree that the new NPPF is clear that it applies immediately for the purpose of development management. However, HBF cannot agree with the Council when it says “Our interpretation of the NPPF focus is that where our local plan policies remain in general conformity with the NPPF that they should continue to be given full or substantial weight in decision making.”

In our view the new NPPF gives great weight to the need for housing, especially when considered against the Cornwall Local Plan that is more than 5 years old. HBF cannot reconcile the Council’s acceptance of a housing figure of 4,421 per annum, significantly more than is currently planned for, is compatible with an argument that the spatial strategy seeking to deliver only 2,600 per annum. To deliver the significant increase in housing supply requires a new approach.

We would question some of the conclusions in Appendix B, in particular Policy 2, should be red, and Policy 7 amber as the increased weight given to the need to provide more housing must impact on where that housing can be provided. The whole point of the presumption in favour of sustainable development when a plan is out of date is to seek to give greater weight to policies which promote and enable new housing development, as required nationally, versus policies which seek to restrict housing- its number and location, in the Local Plan.

We would also question the blanket conclusion that all policies in the Climate Change DPD are green, particularly in light of the WMS and the emerging evidence of the challenges delivering BNG and the viability of housing more generally. The Government has provided further advice for local authorities through the Written Ministerial Statement which says “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.” See <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/HCWS123>

It is also essential for the Council to fully consider a wide range of challenges and additional costs facing developers at this time. For example, HBF information suggests that complying with the current new part L is costing £3500 per plot. The Future Homes Standard Part L in 2025 is anticipated to cost up to £7500+ per plot. There will also be the addition of the Building Safety Levy that is coming in pay for cladding. This will be a per plot basis around the UK, and initial values are around £3000 per plot. The viability evidence that unpins the adopted Local Plan is now very out of date and can not be relied on to provide a robust justification for the viability of the suite of housing policies in the Local plan remaining deliverable. Site specific viability discussion may be needed to help bring schemes forward particularly on brownfield sites, this further emphasises the need for the Council to be embracing a more enabling approach to housing delivery.

Other viability factors that need to be taken into account include increasing costs of materials and labour due to inflation and the costs of mandatory BNG, which are still emerging as the off-site market is becoming established. HBF members are reporting costs of £20-30k per off-site BNG unit. Although the initial price of statutory credits is now known this national fallback option has been deliberately highly priced to discourage their use. Whilst this intention is understandable, at present the lack of functioning local markets for off-site credits causes viability problems because HBF members experience to date suggests that any scheme that needed to rely on statutory credits would become unviable.

The best way for these problems to be addressed in through the rapid and effective preparation of a new Local Plan with meaningful public consultation that helps to set the vision for Cornwall going forward, any vision must be developed as part of the plan-making process. The statements in the IPPS that their is a new vision for a new Local Pan, in advance of any such consultation appears disingenuous and misleading.

In conclusion, HBF welcome the Council’s recognition that the new NPPF, and in particular the new standard method combined with a Local Plan that is more than 5 year old creates issues for developers seeking to deliver new housing in Cornwall, by we do not agree with the Council’s assessment of the validity of their policies and the subsequent assertion that these policies therefore remain a valid and important consideration for determining planning applications.

As Section 4 of the IPPS states that “The Interim Policy Position Statement does not form part of the Local Plan and it does not create planning policies. It is not a Supplementary Planning Document (SPD), nor does it set out the full range of relevant national or local planning policy and practice that may be applied by decision-makers when considering applications for the provision of housing”. As such HBF suggest that, particularly in a time of constrained resources, the Council should be focusing its efforts on meaningful engagement with the house building industry to help to bring new housing sites forward rather than seeking to restrict the location of new development through an IPPS, which is simply not appropriate.

I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

HBF would like to be kept informed of all forthcoming consultations on housing delivery, the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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