

Development Strategy
Blaby District Council
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Dear Sir / Madam

BLABY NEW LOCAL PLAN - ISSUES & OPTIONS CONSULTATION

Introduction

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 contained within the Council's Issues & Options consultation documentation.

Question 1: What start and end dates do you think are the most appropriate for the new Local Plan?

The 2019 National Planning Policy Framework (NPPF) sets out that strategic policies should look ahead over a minimum fifteen years period from adoption to anticipate and respond to long term requirements (para 22).

Question 2: Do you agree with the issues identified?

The HBF agree with the three issues identified namely that :-

- the population of the District and wider Leicester & Leicestershire Housing Market Area (L&LHMA) is growing and new households require housing ;
- additional employment land is needed to support the local economy and future housing growth ; and
- the new Local Plan must identify sustainable locations for housing, employment and other new development.

Housing Growth Options



Question 3: Which of the option(s) do you think should be pursued?

Option C should be pursued. This option uses the standard methodology to assess the Local Housing Needs (LHN) for the District and provides for a share of the unmet needs of Leicester city. The HBF disagree with the proposed approach to the timing of delivery of unmet housing needs from Leicester which should be met as soon as possible and not deferred until the end of the plan period post 2031. The quantum of unmet needs and its re-distribution should be confirmed by the L&LHMA authorities without further delay.

As set out in the 2019 NPPF the determination of the minimum number of homes needed should be informed by an LHN assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). The standard methodology is set out in the updated National Planning Practice Guidance (NPPG). The LHN for Blaby is calculated as 339 dwellings per annum. This calculation is based on 2014 Sub National Household Projections (SNHP) and 2018 affordability ratio. As set out in the NPPG, the LHN figure is calculated at the start of the plan-making process however this number should be kept under review and revised where appropriate (ID 2a-008-20190220). The LHN figure may change as inputs are variable and this should be taken into consideration.

It should be remembered that this figure is only the minimum starting point. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are additional to the LHN figure. The Government's objective of significantly boosting the supply of homes remains (para 59). It is important that housing need is not under-estimated.

The Council should also update its assessment of affordable housing need. The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. An increase in the total housing figures may be considered where it could help deliver affordable housing (ID : 2a-024-20190220). If the Council's re-assessment identifies a significant affordable housing need then the Council should consider a housing requirement figure above LHN.

It is noted that the adopted Local Plan housing requirement figure is 380 dwellings per annum which is higher than LHN. The new Local Plan's housing requirement figure should comprise the LHN figure for Blaby plus an additional unmet housing need figure for Leicester City.

Employment Growth Options

Question 4: Which of the option(s) do you think should be pursued?

A combination of **Option B** (working with neighbouring authorities to meet the different types of employment requirements across a wider area) and **Option C** (supporting employment growth above identified needs) should be pursued.

The Council should seek to increase its competitive advantage whilst working collaboratively with neighbouring authorities in the Functional Economic Market Area. Blaby District is well location to attract businesses because of its strategic location close to the M1 and the advantages of access to the wider Strategic Road Network. In the Leicester & Leicestershire Strategic Growth Plan (L&LSGP) five key growth areas are identified of which Leicester Our Central City, the A46 Priority Growth Corridor and the A5 Improvement Corridor are relevant to Blaby. As set out in the 2019 NPPF in achieving sustainable development the overarching economic and social objectives should be pursued in mutually supportive ways (para 8). The positive and proactive encouragement of sustainable economic growth should address potential barriers to investment such as inadequate housing (paras 81a & 81c). There should be a balance between jobs and homes. If the Council is seeking to maintain and even strengthen its sub-regional employment role then the opportunity for more housing growth should be considered to support the economic growth ambitions of the L&LSGP.

An updated the joint evidence base will be required to provide a clearly evidenced audit trail.

Locational Strategy Options

Question 5: Which of the option(s) do you think should be pursued?

The new Local Plan's spatial strategy as set out in its strategic policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver a housing requirement which meets the District's housing needs and assists in meeting unmet housing needs arising in Leicester city. The Council's Housing Land Supply (HLS) should provide a sufficient supply of land to meet the housing requirement, to ensure the maintenance of a 5 Year Housing Land Supply (YHLS) and to achieve Housing Delivery Test (HDT) performance measurements.

The new Local Plan's spatial strategy should also set out where that growth is located. This should include consideration of a combination of Options A to E, which are :-

- Option A - continue with the existing adopted locational strategy policy approach ;
- Option B – extend the Leicester Principal Urban Area (PUA) focus ;
- Option C - spread the distribution of growth ;
- Option D - infrastructure led development at strategic sites / garden villages ; and
- Option E – a single new standalone settlement.

There should be sufficient sites to meet the District's housing needs and Leicester city's unmet housing need both close to where those housing needs originate and beyond. There should be a short and long-term supply of sites within, adjacent to and beyond the PUA on both brownfield and greenfield land.

Strategic and non-strategic allocations for residential development should be identified.

A contingency in the Council's HLS provides flexibility to response to changing circumstances as well as providing choice and competition in the land market. There is no numerical formula to determine the quantum of a contingency for flexibility but where the HLS is highly dependent upon one or relatively few large strategic sites and / or one locality then greater numerical flexibility is necessary than if the HLS is more diversified. The widest possible range of housing sites by both size and market locations should be sought to provide suitable land for small local, medium regional and large national housebuilding companies. 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 and creates opportunities to diversify the construction sector.

As set out in the 2019 NPPF at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68a). The Council should confirm that this national policy requirement will be achieved.

Strategic Greenfield Designations Options

Question 6: Which of the option(s) do you think should be pursued?

Option B should be pursued. This option reviews the principle of whether or not the Green Wedge, Area of Separation and Countryside designations should be retained. If retained the detailed boundaries should be reviewed to take account of the new Local Plan site allocations and any other factual updates.

Housing

Question 10: Do you agree with the issues identified?

The HBF agree with the following issues identified as :-

- a lack of affordable housing to meet local needs ;
- different groups have different housing needs in terms of house type and size ; and
- accommodation suitable for older people should be provided.

Affordable Housing Policy Options

Question 11: Which of the option(s) do you think should be pursued?

A combination of Options should be pursued. A higher housing requirement should help deliver more affordable housing as proposed under **Option D**. The Council should also consider the allocation of affordable housing sites and rural exceptions sites as proposed under **Option C**.

As suggested in **Option B** any proposed policy modification of site thresholds from 15 or more dwellings and / or the percentage of affordable housing provision (currently 25% in the adopted Local Plan) should be fully justified by updated evidence and viability tested. The Council should also consider updating its Affordable Housing Policy in relation to the requirement for 10% affordable homeownership and entry level exception sites.

Housing Mix Policy Options

Question 12: Which of the option(s) do you think should be pursued?

All households should have access to different types of dwellings to meet their housing needs. As set out in 2019 NPPF the housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (paras 61 & 62). 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 (para 31). The Council should allow the market to determine the mix of type and size of housing (**Option C**) or continue with its existing adopted policy approach (**Option A**), which allows flexibility based on the most recent evidence of housing needs in terms of type, tenure and size.

When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households without seeking overly prescriptive housing mixes on individual sites. **Option B** should not be pursued. A prescriptive policy approach setting out specific policy requirements for the types and sizes of housing is inappropriate. The new Local Plan should ensure that suitable sites are available for a wide range of different types of development across a wide choice of appropriate locations.

Housing for an ageing population and specialist needs Policy Options

Question 13: Which of the option(s) do you think should be pursued?

A combination of Options should be pursued. The Council's approach should accord with the recently published NPPG on the needs of an ageing population (ID 63-001-20190626 to 63-019-20190626). The Council should consider inclusion of policy requirements for house types suitable for older people and others with specialist needs, which may include bungalows, retirement, sheltered, extra care, registered care, convalescent care and other specialist housing. Any proposed additional requirements should be subject suitable evidence of local need and viability testing (**Option C**). The Council should also consider allocating sites specifically for older persons and other specialist housing (**Option D**). Any site allocation should satisfy specific site criteria such as the proximity of sites public transport, local amenities, health services and town centres.

Under **Option B** if the Council wishes to adopt the optional standards for accessible and adaptable homes then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46). Footnote 46 states *“that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing where this would address an identified need for such properties”*.

The Council is reminded that all new homes are built to Building Regulation Part M Category 1 (M4(1)) standards, which include level approach routes, accessible front door thresholds, wider internal doorway and corridor widths, switches and sockets at accessible heights and downstairs toilet facilities usable by wheelchair users. These standards are not usually available in the older existing housing stock and benefit less able-bodied occupants. These standards are likely to be suitable for most residents.

As set out in the 2019 NPPF 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 (para 31). The Council should gather evidence to determine whether there is a need for such standards in Blaby. The NPPG sets out the evidence necessary to justify a policy requirement for accessible and adaptable homes. The Council should apply the criteria set out in the NPPG (ID 56-005-20150327 to 56-011-20150327) to ensure that an appropriate evidence base is available to support its proposed policy requirements. This evidence includes identification of :-

- the likely future need ;
- the size, location, type and quality of dwellings needed ;
- the accessibility and adaptability of the existing stock ;
- variations in needs across different housing tenures : and
- viability.

The Council’s supporting evidence should include detailed information on the accessibility and adaptability of the existing housing stock, the size, location, type and quality of dwellings needed and variations in needs across different housing tenures.

In determining the quantum of accessible and adaptable homes the Council should focus on the ageing population living in the District compared to national / regional figures and the proportion of households living in newly built homes. If the Government had intended that evidence of an ageing population alone justified adoption of higher optional standards then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case. The Council should provide a local assessment evidencing the case for Blaby which justifies the inclusion of optional standards in all or a proportion of newly built dwellings. Many older people already live in the District and are unlikely to move home. Those that do move may not choose to live in a new dwelling. The optional standards should only be introduced on a “need to have” rather than a “nice to have” basis. Need is generally defined as *“requiring something because it is essential or very important rather than just desirable”*.

The Council is reminded that the requirement for Building Regulation Part M Category 3 : Wheelchair user homes (M4(3)) should only be required for dwellings over which the Council has housing nomination rights as set out in the NPPG (ID 56-008-20150327). Any requirement for higher optional standards especially M4(3) should be thoroughly viability tested. In September 2014 during the Government's Housing Standards Review EC Harris estimated the cost impact of M4(3) per dwelling as £15,691 for apartments and £26,816 for houses. These costs should be subject to inflationary build cost increases and should be included in the Council's future viability testing.

Design Policy Options

Question 16: Which of the option(s) do you think should be pursued?

The Council should continue with its existing adopted policy approach to promoting good design (**Option A**). If supported by a design specific Supplementary Planning Document (SPD) (**Option C**), this SPD should not be referenced in policy which would give development plan status to a document which has not been subject to the same process of preparation, consultation and Examination contrary to the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulations). **Option B** setting out a more detailed approach to design policy is not considered necessary.

Climate Change Policy Options

Question 19: Which of the option(s) do you think should be pursued?

The Council should update its current adopted policy (**Option A**) and / or consider the use of an SPD (**Option C**). **Option B** should not be pursued which would consider setting a requirement for sites (of a certain size) to provide a percentage of their energy requirements through on-site renewable / low carbon energy generation sources and on strategic sites to provide decentralised energy supply systems (such as combined heat and power).

The HBF acknowledges that the Government has not enacted its proposed amendments to the Planning & Energy Act 2008 to prevent the Council from stipulating energy performance standards that exceed the Building Regulations but consider that the Council should comply with the spirit of the Government's intention of setting standards for energy efficiency through the Building Regulations and to maintain this for the time being at the level of Part L 2013 (as set out in *Fixing the Foundations*, HM Treasury, July 2015).

Under the 2019 NPPF new development should be planned to help reduce greenhouse gas emissions by its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards (para 150b). The Government has sought to set standards for energy efficiency through the Building Regulations. The starting point for the reduction of energy consumption should be an energy

hierarchy of energy reduction, energy efficiency, renewable energy and then finally low carbon energy. From the start, emphasis should be on a “fabric first” approach which by improving fabric specification increases thermal efficiency and so reduces heating and electricity usage consequentially newly built homes are far more energy efficient than the existing housing stock.

The HBF support the movement towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements which is universally understood and technically implementable. It is the HBF’s opinion that the Council should not be setting different targets or policies outside of Building Regulations. The key to success is standardisation and avoidance of every Council in the country specifying its own approach to energy efficiency, which would undermine economies of scale for both product manufacturers, suppliers and developers.

Transport policy options

Question 25: Which of the option(s) do you think should be pursued?

Option A should be pursued which continues with the existing adopted policy approach of encouraging more sustainable transport modes whilst acknowledging that private cars have an important role in transporting people.

Infrastructure policy options

Question 27: Which of the option(s) do you think should be pursued?

Option A should be pursued which continues with the existing adopted policy approach of seeking on-site provision and financial contributions for a wide range of infrastructure (including health, education, policing, libraries and other forms of social infrastructure), where new development requires the provision.

Conclusion

For the new Blaby Local Plan to be found sound under the four tests of soundness as defined by the 2019 NPPF the Plan should be positively prepared, justified, effective and consistent with national policy (para 35). It is hoped that these responses are of assistance to the Council in preparing the next stages of its new Local Plan. As the new Local Plan preparation progresses the HBF look forward to submitting further representations at later consultation stages in the meantime if any further information or assistance is required please contact the undersigned.

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



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