

**Home Builders Federation**

**ID: 157**

**Matter 8**

## **HART LOCAL PLAN EXAMINATION**

### **Matter 8 – Other Housing Types and Related Policies**

Housing Mix – Policy H1

#### 8.1 Is criterion b) based on a robust assessment of viability? Has the viability assessment underestimated the cost?

As we set out in our representations, the Council's Addendum to the 2016 Whole Plan and CIL Viability Study the costs of complying with the Council's policies are set out in section 3. Within this section the Council outline in "Other Costs" and in this are included costs related to the optional technical standards for access and water efficiency. The estimated costs are £850 per unit. When compared to the evidence produced in 2014 by EC Harris in support of the Housing Standards Review this estimate would appear to be low. The EC Harris report sets out the access costs and access related space costs per units in relation to Part M4(2) are:

- £1,622 for a 1-bedroomed apartment
- £1,629 for a 2-bedroomed apartment
- £1,967 for a 2-bedroomed terrace house
- £2,687 for a 3-bedroomed detached house
- £2,686 for a 4-bedroomed detached house

As such the costs of implementing this policy are either double or triple those set out in the Viability Study. Whilst the impact of this underestimation of costs will be reduced due to the 15% threshold it is important that the actual impacts of such policies are tested. We would also suggest that the 15% threshold be set out a maximum requirement rather than being consider a starting point for any such provision.

#### 8.3 Is criterion d) consistent with national policy?

No. As we set out in our representation paragraph 57-024 of PPG sets out a variety of approaches that need to be considered – including the use of their own land. This is reiterated in para 57-014 of the PPG which sets out the need for Council's to



consider how they can support the delivery of self-build plots through their housing strategy, land disposal and regeneration functions. We also consider the approach taken to be contrary to paragraph 57-025 of PPG as the approach taken by the Council imposes a requirement on developers and land owners to provide plots for self-build and custom house building. PPG establishes an approach that encourages the councils to engage with land owners of appropriate sites for the delivery of self-build plots, this is distinct from the requirement set out in policy H1.

8.4 What is meant by 'suitable site' in criterion d)?

We would welcome further clarity about when a site would not be considered suitable for self or custom house building. There will be sites where the nature of a development and the site would not support the provision of separate plots. Most obviously sites providing higher density flatted developments would not be able to provide plots for self-builders. In other cases, access for construction purposes to site may be time limited preventing development of plots at a later date. As such it is important that there is flexibility regarding this policy and its application.

8.5 Are the thresholds set out in criterion d) justified? What evidence is there to suggest they are appropriate?

We could find no evidence with regard the level of demand for self-build and custom house building nor any assessment of expected demand is realistic or could be addressed through other mechanisms set out in PPG.

8.6 The supporting text at Paragraph 176 sets out that if self/custom build plots are not taken up after two years, the Council will allow them to revert back to conventional building plots. The Council has proposed a modification to one year. Is that an appropriate time period?

We welcome the reduction proposed by the Council as this represent a more appropriate time period within which plots should return to the developer allowing them to deliver the plots as part of the original scheme.

Mark Behrendt MRTPI  
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