

**LOCAL PLAN REVIEW DEVELOPMENT STRATEGY OPTIONS AND POLICY OPTIONS -
JANUARY TO MARCH 2022**

SUMMARY OF RESPONSES TO Q6

Q6 - DO YOU AGREE WITH THE PROPOSED SELF-BUILD AND CUSTOM HOUSEBUILDING POLICY? IF NOT, WHY NOT?

A summary of the issues raised in the comments received are set out below:

Comments	NWL Officer Response
In favour of small-scale self build projects.	Noted.
Normal planning rules should be used to determine the viability of such a scheme.	Policy is not considered to be overly prescriptive. Policy wording amended to make specific reference to viability.
Approach may offer a more flexible approach to housing provision and protection of the countryside.	Local Plan policy seeks an appropriate balance between the provision of suitable housing and the protection of the environment.
Does the Council have the manpower to run anything bigger than the odd self-build project?	It is not being suggested that the Council provide self build and custom build homes or run the building projects.
Self-build and custom housebuilding objectives, key in the delivery of new homes and the policy should reflect the statutory obligations of the Self-Build and Custom Housebuilding Act 2015.	Noted.
Allocate specific sites for self-build and custom build housing.	Whilst it is open to the Council to allocate specific sites for self and custom build, it would need evidence to demonstrate that they would be available for such a use. Furthermore, any such site would have to be considered in the same way that other sites are as there are no 'special circumstances' in national planning policy for self build and custom housebuilding as opposed to general housing.
Identify specific allocations that are suitable to deliver a proportion of new homes as self-build and custom housebuilding.	The proposed policy seeks to encourage developers to provide an element of self build and custom housebuilding plots where there is evidence of need. This provides the flexibility for specific site circumstances and characteristics to be taken on board when considering their suitability in providing these plots.
Include guidance for applications to be assessed against issues such as design, amenity, highway safety and climate change.	The new Local Plan will also include a suite of policies, covering these issues, and applicable to all development in the district. Repetition of policies is not necessary.
Development be in keeping with surroundings and the character of the area, and of a suitable quality and architecture. Concern that corners are cut in this type of build.	The new Local Plan will include policies addressing these issues and will be applicable to all development in the district.

<p>Should not be located on greenfield sites nor form ribbon development. Environment should be protected.</p>	<p>The new Local Plan will seek to promote a sustainable pattern of development, including the re-use of brownfield land, and the protection of the natural environment, balanced against the development needs of the area.</p>
<p>Homes should be sustainable and include infrastructure for electric charging points.</p>	<p>The new Local Plan will include policies seeking to address the environmental impact of all development, including impacts on climate change.</p>
<p>People shouldn't be put off the self-build register by high fees. Far higher percentages of self and custom build houses are achieved in many countries.</p>	<p>There is no fee applied to be added to the district's self-build register. Proposed policy demonstrates the Council's support for self build and custom housebuilding and provides a mechanism that seeks to increase the supply of such.</p>
<p>Planning and building control should ensure that the sites are properly monitored.</p>	<p>Comments noted.</p>
<p>Unsold plots should not be available for sale/build out by developer. Leaves opportunity for developer to price plots out of the market in order they are able to develop them at a later date.</p>	<p>There may ultimately be instances where there is insufficient interest in the purchase of the allocated self build and custom housebuilding plots. Rather than the plot remaining vacant indefinitely it is considered preferable the plot be made available for sale on the open market.</p> <p>It is suggested that the policy wording is amended to ensure that the serviced plots are appropriately marketed. The local authority will also have a role to play in ensuring those on the register are aware of the development of such plots. Supporting text will clarify what is expected to be provided in terms of a serviced plot.</p>
<p>Support for unsold plots to be used for the delivery of general market housing.</p>	<p>Noted.</p>
<p>The proposed availability and marketing of plots for a period of at least 12 months is too long.</p>	<p>It is considered that 12-months is a reasonable and balanced approach and length of time to provide an opportunity for plots to be marketed.</p>
<p>The level of self-build and custom housebuilding planning applications is not representative of the demand for plots. The level of demand would be greater. Unclear whether any secondary sources of data have been explored.</p>	<p>Noted. The NPPG advises that level of demand is established by reference to the number of entries added to an authority's register during a base period. Therefore reference will be made to the Register in order to identify current and upcoming demand.</p> <p>However it is acknowledged that the NPPG also suggests that the demand data from the register can be supported as necessary from secondary sources.</p> <p>Supporting text will acknowledge the role of secondary data, and that it will be referred to if and when</p>

	appropriate, for example, if demand on the Register is met and justification is being made for a proposal.
Approach is not positive. Does not promote the existence of the register. Does encourage self-build and custom builds as route for providing for housing. Can add value to the variety and quality of housing stock.	<p>The range of benefits of self build and custom housebuilding is noted and agreed.</p> <p>The specific self build and custom housebuilding policy seeks and encourages the provision of plots.</p>
The Local Plan should enable the delivery of appropriate self-build plots without overly prescriptive policies and requirements.	Policy is not considered to be overly prescriptive. Seeks a mixed approach to the provision of plots. Allows for account to be taken of site characteristics, level of demand, viability and the market.
Agree with hybrid approach – specific support for the lack of delivery target and provision of plots on sites suitable for housing.	Noted.
Unclear how the policy would run along the approach for Local Needs Villages. As Local Needs Housing policy would provide support for new dwellings in the countryside but the current approach for self-build and custom housebuilding does not.	It is the intention that the proposed Local Housing Needs Policy would also apply to self building and custom housebuilding plots where it can be demonstrated that the requirements of the Local Needs Housing policy can be satisfied.
Threshold of 50 is too high and could lead to abundance of plots without evidence of need. Request consideration be given to a higher entry point.	<p>The approach seeks to avoid burden being placed on small and medium sites.</p> <p>Policy to be amended to clarify that when seeking/encouraging serviced plots on sites of 50 or more dwellings, the Council will refer to the Register to identify any current and upcoming demand. Policy seeks provision where servicing and site arrangements can be made suitable and also allows for account to be taken of site characteristics, the level of demand on the register, viability and market conditions.</p>
Could be an opportunity to specify the provision for plots.	This approach would undermine the flexibility of the policy. By not detailing a specific provision, this allows for account to be taken of site characteristics, the level of demand on the register, viability and market conditions.
Quantity of self-build and custom housebuilding plots should be taken into account when setting trigger points for infrastructure delivery and/or financial contribution.	Noted. Policy allows for development of plots for market housing if plots are not taken up as self build and custom housebuilding plots. Therefore, triggers would still be met.

<p>If trigger point reliant on delivery of these plots, there is a risk this may not happen.</p> <p>If plots are excluded when setting the trigger point considerable new homes could come forward without delivery of necessary infrastructure.</p>	
<p>Developers should be encouraged to enable self-build by the allocation of CSB plots with options for developers to offer multi plot sites provisioned with services and road access.</p>	<p>It is considered that the suggested policy would allow for this, if there is the demand and in suitable locations for housing.</p>
<p>No evidence, legislative or national policy basis to require sites of 50 dwellings to provide such plots.</p> <p>NPPG advises Council should 'engage' and 'encourage' landowners to consider self and custom builds 'where they are interested.'</p>	<p>Policy seeks to engage and encourage provision . Provision will be sought, based on the demand contained in the register, and where servicing and site arrangements can be made suitable. No specific quantum of development is prescribes to allow for for account to be taken of site characteristics, the level of demand on the register, viability and market conditions.</p>
<p>Approach excludes smaller sites which tend to be more attractive to custom and self builders.</p>	<p>The Council will specifically seek to encourage provision on sites of 50 or more dwellings but it does not exclude provision being proposed in smaller sites, where there is a demand and is in a suitable location.</p>
<p>It is also unclear from the policy wording when self or custom build would be required on site.</p>	<p>The provision of plots will be sought on sites capable of providing 50 or more dwellings, where suitable servicing and site arrangements can be made.</p> <p>However no specific quantum is referred to in order to allow some flexibility to the policy. The suggested approach allows for negotiation and account to be taken of a variety of factors, such as site size and characteristics, the level of demand on the register, infrastructure provision, viability and market conditions. All of these could determine whether the site is suitable to provide self-build and custom housebuilding plots.</p> <p>Policy to be amended to clarify that when seeking/encouraging serviced plots on sites of 50 or more dwellings, the Council will refer to the Register to identify current and upcoming demand.</p>
<p>Policy fails to identify the quantum of CSB plots on site. For example, what proportion of the register need should be delivered on site, what</p>	<p>Policy to be amended to clarify that when seeking/encouraging serviced plots on sites of 50 or more dwellings, the Council will refer to the Register to identify current and upcoming demand.</p>

<p>percentage/number of plots would be required.</p>	<p>However no specific quantum is referred to in order to allow some flexibility to the policy, for account to be taken of site characteristics, the level of demand on the register, viability and market conditions.</p>
<p>Policy is unclear as what evidence is required to be submitted.</p> <p>What is meant by 'or other evidence submitted as part of any planning application.'</p>	<p>Noted and policy to be amended to clarify that when seeking/encouraging serviced plots on sites of 50 or more dwellings, the Council will refer to the Register to identify current and upcoming demand.</p> <p>Supporting text will acknowledge the role of secondary data, as is detailed in National Planning Policy Guidance, and that it will be referred to if and when appropriate, for example, if demand on the Register is met and justification is being made for a proposal.</p>
<p>Register may be creating an artificial need i.e. more an expression of interest, register on multiple registers, lack of finance or skill to undertake a project.</p>	<p>In accordance with national policy, the Council must give suitable development permissions to enough suitable serviced plots of demand for self-build and custom housebuilding in their area. The level of demand is established by reference to the number of entries added to an authority's register during a base period.</p>
<p>Most self-build proposals will come from applicants that already have their own land/looking for bespoke applications.</p>	<p>Policy supports applications of this nature in locations considered suitable.</p>
<p>Inspectors have rejected proposals in other plans that require a specific percentage of plots on allocated sites, for a number of reasons, such as level of need, lack of justification, potential for plots to remain vacant, viability, practicalities of delivering plots (health and safety).</p>	<p>The policy itself does not state a specific percentage and in recognition of some of these issues, allows sites to be considered where circumstances are appropriate.</p> <p>A viability assessment will also be undertaken of all the policies of the New Local Plan.</p>
<p>Practical issues in terms of delivery, such as working hours, health and safety implications, length of build programme, gaps within street scene as project timings differ, presence of multiple contractors and market ability. The requirement may dissuade housebuilders from operating in the district.</p>	<p>Appreciated there are potential issues in respect of the delivery of plots on larger housing allocations and the policy makes reference to the suitability of servicing and site arrangements. These issues will depend on the sites characteristics including layout. However, these should not act as a barrier to development and should be considered early on in the development process. For example, role of the site manager to coordinate issues such as Health and Safety, site deliveries and storage of materials, and implementation of practical measures to take account of differing site access requirements during the construction phase.</p>

<p>Approach will not boost housing supply within the district.</p>	<p>The aim of the policy does not seek to increase housing supply. Rather it seeks to support a mix of housing type that meets the needs of the district and responds to national policy which requires authorities to provide for SCB.</p>
<p>Potential for unsold plots and timescale for reversion of these plots to the original housebuilder to create practical difficulties in co-ordinating construction activity on site.</p>	<p>Proposed policy is considered a reasonable and balanced approach and length of time provides an opportunity for plots to be marketed.</p> <p>Certainty of what would be required would allow developers to allow this requirement to be incorporated in their management and delivery plans for the development of the site.</p>
<p>Impact on viability, for example, detrimental impact on the level of affordable housing provision.</p>	<p>A Viability Assessment will be undertaken of the Local Plan which will address these matters and consider the financial impacts of the proposed policy approach.</p>
<p>Self build plots should be counted within the total number of units delivered on a site when calculating affordable housing provision.</p>	<p>When the threshold is applied, for affordable housing provision, this will take into account the overall number of properties/plots on site, for example, open market housing as well as self build and custom housebuilding plots.</p> <p>If affordable housing is triggered when self-build plots comprise part of the development, the new Local Plan will allow for viability considerations to be taken into account.</p> <p>The approach will be clarified and addressed as part of the Affordable Housing policy.</p>
<p>These plots can represent a proportion of affordable housing as 'other affordable routes to home ownership' and may support viability. Policy could include this option.</p>	<p>NPPG suggests that self-build and custom build can provide a route to affordable home ownership.</p> <p>Therefore if it is demonstrated that a self-build or custom build property were to meet the definition of affordable housing, such development would be subject to a legal agreement requiring the property to remain as 'affordable housing' for perpetuity.</p>
<p>No legal or national policy requirement that states the delivery of CSB plots is more important than market housing. Seems incongruous to structure a policy that would result in less market housing being delivered.</p>	<p>Local Planning Authorities are required to undertake an assessment of local housing need, including of those people wishing to self-build or custom-build their own homes. This policy seeks to support the authority in its duty to give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area.</p>
<p>Plan should encourage provision on strategic sites, recognising the</p>	<p>Policy seeks provision on suitable sites of 50 dwellings or more, where servicing and site arrangements can be made</p>

potential difficulties and the need for robust evidence of need	suitable and attractive, where there is a clear evidence of demand. As stated in the NPPG, the level of demand is established by reference to the number of entries added to an authority's register during a base period, as well as secondary sources of data where necessary, which is to be reflected in the policy wording.
Schemes may still generate the need for a contribution towards the provision of new school places.	Noted.