

F5G Council's response to Q60-64 housing standards and housing mix - August 2020

INSPECTORS' QUESTION 60

The Framework in paragraph 127 seeks the provision of a high standard of amenity for existing and future users. Footnote 46 confirms that planning policies may make use of the optional technical standards for accessible and adaptable housing, where this would address an identified need. It also states that the nationally described space standards may be used, where the need for an internal space standard can be justified.

1. Paragraph 127 of the NPPF (including footnote 46) is noted.

INSPECTORS' QUESTION 61

In relation to the technical standards included in Policy HP01, what is the identified need and justification for requiring all dwellings on sites of 10 or more homes, to be built to the M4(2) standard, unless it complies with the M4(3) standard? Similarly, what is the identified need and justification for a minimum of 5% of new affordable houses on sites of 60 or more dwellings, to meet the M4(3) standard? What is the justification for the 60 dwelling threshold?

Identified need for the application of M4(2) and M4(3) standards

2. The NPPF requires local planning authorities to plan for a mix of housing to address the housing needs of groups with particular needs such as older and disabled people. The PPG states that:

'Accessible and adaptable housing enables people to live more independently, while also saving on health and social costs in the future'...

... 'accessible and adaptable housing will provide safe and convenient approach routes into and out of the home and outside areas, suitable circulation space and suitable bathroom and kitchens within the home. Wheelchair user dwellings include

additional features to meet the needs of occupants who use wheelchairs, or allow for adaptations to meet such needs.'

(Reference ID: 63-008-20190626)

3. Recognising that a number of elderly person households and those from other sectors of the community are likely to have a need for adaptable or accessible homes, the Council's requirements for major development to be built to the M4(2) or M4(3) standard were firstly introduced in the [Regulation 18 Draft Local Plan 2016](#) (evidence document [B9](#)) as part of the then Policy 7.2: Housing mix, types, and tenures. These requirements were informed by the SHMA 2013 which indicated an above average proportion of the Borough's households contain older persons (27.1%). The proportion of the Borough's population living beyond 65 years of age was forecast to rise significantly over the Plan period. Additionally, this study indicated that 17.1% of households in the Borough contained a member with a disability/limiting long term illness, the largest group of people were those with a walking difficulty. It went on to state that 63.2% of households with a wheelchair user in the Borough did not live in suitably adapted premises.
4. The PPG (Reference ID: 56-007-20150327) details the data sources that can be used to provide evidence of the need in local planning authorities for dwellings that meet higher accessibility, adaptability and wheelchair housing standards. These have been researched, and some have been used to provide the contextual information presented in the [SHMA 2016 Part 2](#). To model the future requirement for adaptable and accessible housing, the CORE LA Area Lettings Reports for the last three years (2016/17 to 2018/19) have been principally utilised. These provide details about those that have moved into affordable accommodation – both general needs and specialist homes. This source records whether households that moved into affordable housing in Brentwood over the last three years require fully wheelchair accessible housing, whether they require level access housing, or whether they have other disability related requirements. Conversely, the data also indicates households where there were no disability related housing design or adaptation requirements.

Justification for requiring all dwellings on sites of 10 or more homes to be built to the M4(2) standard

5. The data source indicates that where this information was collected¹, some 14.7% of moving households required a home with an adaptation to meet their mobility requirement. However, it is also necessary to account for the changing profile of the population in the Borough over the plan period. The [SHMA 2016 Part 2](#) forecasted an even stronger rise than previously seen in population aged 65 or over (44.8% from 2013 to 2033) and revealed a strong correlation between age and long-term health problem or disability. Therefore, the relative demand for accessible and adaptable accommodation is likely to grow as the population ages.
6. Data from the Council's Disabled Facilities Grants, cited in this study, of which purpose was to help people to remain in their current home by providing support and assistance, also showed an increased on demand for housing adaptations, which may have been linked to the shortfall of accessible homes.

¹ There were a small number of respondents where this detail is unknown.

7. Further, the disaggregated future population for Brentwood in 2033, as identified within the Objectively Assessed Need calculation, indicates that the population aged 65 or over will grow 30.1% quicker during the plan period than the population aged under 65. It is presumed that the rate of requirement for a home with an adaptation to meet mobility requirement also increases by this amount meaning that by 2033 some 19.1% of moving household will require an adapted home.
8. If it is presumed that this rate was reflective of general demand across the Borough, and applied to the number of moves projected to occur at the end of the plan period in 2033 (8,597 per annum as modelled within the long-term balancing housing market model that is described in Chapter 4 of the original [SHMA 2016 Part 2](#)), this would mean there would be an annual requirement for 1,645 accessible and adaptable dwellings in Brentwood. Over a three year period this would amount to 4,935 dwellings, which highlights how quickly the requirement for this form of accommodation would grow in the Borough (after this three year period it is presumed that some of the dwellings would be available for reuse by another household).
9. It is recommended (by HDH) that as a starting point around 5,000 new homes should be built to accessible and adaptable standard over the remainder of the plan period (between 2016 and 2033). This implies that a notable uplift will be required to the number of homes that meet this standard currently, and that by the end of the plan period around 10.0% of the total stock should be available that meet this criteria. This is an estimated requirement for M4(2) Category 2 accessible and adaptable homes. Figure 6.2 of the SHMA Part 2 (reproduced in table 61 below) indicates that almost two-thirds of those with a long-term health problem or disability in Brentwood in 2011 were owner-occupiers and just over a third were in rented accommodation (either private or affordable). If it is presumed that this tenure distribution for the group was to remain consistent across the plan period and that households in rented accommodation would need to access an accessible or adapted home within an affordable tenure, whilst those in owner-occupied home could afford a market equivalent, it would be recommended that 1,700 of these accessible and adaptable homes should be within an affordable tenure and 3,300 as market accommodation.

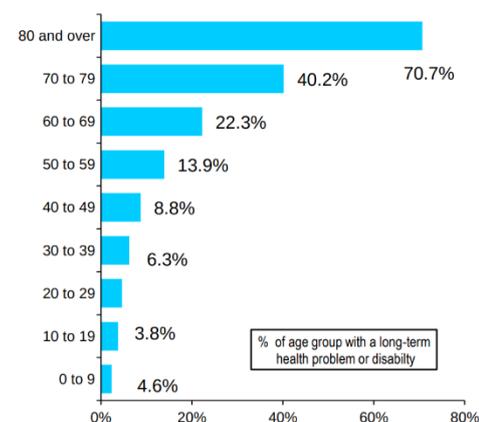
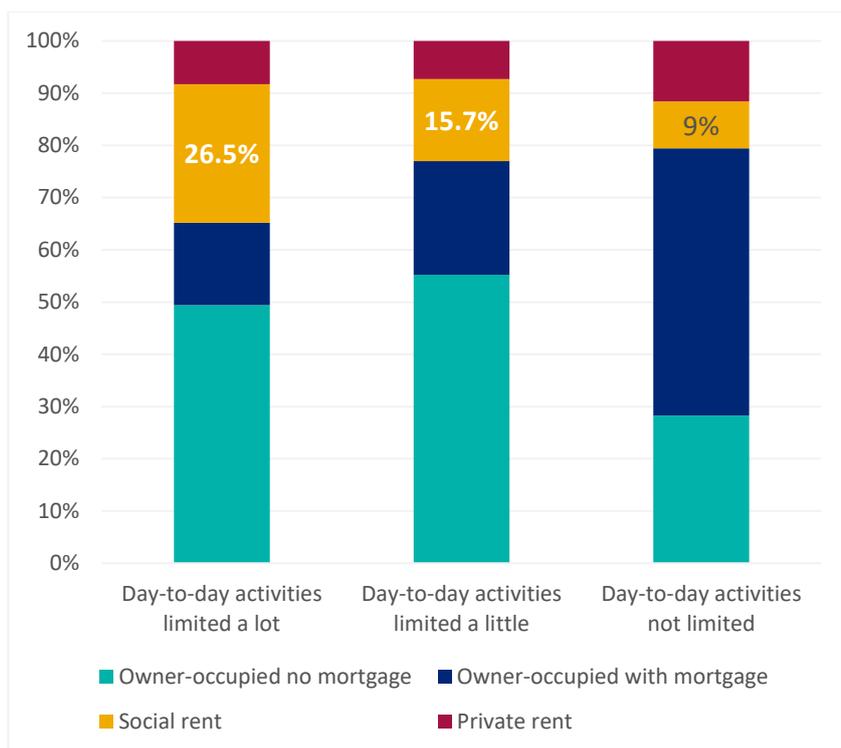


Table 61: Tenure and age profile of people with a long-term problem or disability in Brentwood compared to the remainder of the population (source: reproduced from Figure 6.2 of SHMA Part 2 2016)

10. Policy HP01 requires that all new development of 10 or more homes to be built to M4(2) standard. Site allocations of 10 or more dwellings in the Local Plan total 6,079 units; Policy HP05: Affordable Housing requires 35% of these to be affordable units. Combining the requirements of the two policies would deliver 6,079 units to be built to the M4(2) standard; 2,128 of these would be within an affordable tenure and 3,951 as market accommodation. Policy HP01 requirement regarding the M4(2) standard is therefore justified.

Justification for requiring 5% of affordable housing on sites of 60 or more dwellings to meet M4(3) standards

- It is important to provide adaptable or accessible homes for people with physical disability. Homes built to M4 Category 3 (Wheelchair User Adaptable Dwellings) are either adjustable for occupation by a wheelchair user, or accessible, i.e. constructed for immediate occupation.
- Table 61 above shows that whilst people with a long-term health problem or disability are more likely than average to either be owner-occupiers with no mortgage, or reside in the social rented sector.
- The PPG (Reference ID: 56-007-20150327) makes it clear that '*Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling*'. It is therefore presumed that this requirement should apply only to affordable units.

14. Using the same data source but focusing specifically on those that require fully wheelchair accessible housing, suggests that some 1.6% of moving households require a wheelchair accessible home currently. If it is presumed that this rate is uplifted to reflect the increasing prevalence of older people in the population over the plan period, it is estimated that 2.0% of moving households will require a wheelchair accessible home in 2033. Again applying this figure to the modelled number of moving households in 2033 and uplifting this annual requirement to a three year total, suggests that by the end of the plan period around 525 homes should be available that meet this criteria, around 1.3% of the total stock in the Borough in 2033.
15. Policy HP01 requires a minimum of 5% of affordable units on sites of 60 or more dwellings to be built to M4(3) standards. Site allocations of 60 or more dwellings in the Local Plan total 5,614 units; Policy HP05: Affordable Housing requires 35% of these to be affordable units. Combining the requirements of the two policies would deliver 98 affordable units built to the M4(3) standard, equating around 18% of total demand (98 against 525). If it is presumed that the tenure distribution for the group was to remain consistent across the plan period (as shown in table 61 above), this requirement would broadly meet future demand. It is however important to note that this is a minimum requirement, and that part of this demand would also be met by the private sector.
16. The cost for the above requirements was tested in the [Viability Assessment](#) (see evidence document [C38](#)) giving the Council confidence that general development that comes forward across the Borough is going to be viable and bear the Council's full policy requirements.
17. Based on available evidence and cumulative viability testing, it is the Council's position that the requirement of 5% of affordable housing to meet M4(3) standards is justified on sites of 60 or more dwellings.

Justification for the 60-dwelling threshold

18. The 60-dwelling threshold is practically the minimum size for a development to deliver one whole unit to be built to M4(3) standard, where the requirement is 5% of affordable housing (35% of total dwelling). This is explained in the below equations:
 - $60 \times 35\% = 21$ affordable units delivered
 - $21 \times 5\% = 1$ unit built to the M4(3) standard delivered

INSPECTORS' QUESTION 62

As regards the internal space standards, paragraph 6.41 of the Plan states that needs are identified in the Council's authority monitoring report (AMR). Can the Council clarify this please, point us to where the AMR is in the evidence and justify the requirements of Policy HP06 in this regard?

19. In 2015, the Government introduced a space standard, 'Technical housing standards – nationally described space standard' which sits alongside Building Regulations as an optional standard. This space standard deals with internal space for new houses and flats and applies across all tenures of housing. It sets out requirements for the gross internal floor area (GIA) of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of homes. According to research by the Royal Institute of British Architects (RIBA), the average new home in England is only 92% of the recommended minimum size. This means there might not be enough space for furniture, storage, socialising or spending time in quiet.
20. Brentwood generally has a wide-ranging mix of house types within its area and therefore the Government standards appear to fit well with the housing stock in Brentwood. There are no particular issues within Brentwood's housing market that would require a departure from the national standards.
21. The Council acknowledged that there has been an error in paragraph 6.41 with regards to reference to the AMR. It is proposed that reference to the Council's authority monitoring report (AMR) in paragraph 6.41 to be removed.

INSPECTORS' QUESTION 63

How has the Council considered the likely future need for housing for older and disabled people, the accessibility and adaptability of existing housing stock, how needs vary across tenures and the overall impact on viability? Have the standards and housing mix requirements in Policies HP01 and HP06 been suitably viability tested to ensure that residential development is viable?

Housing needs for older and disabled people

22. The Council attaches great importance to high quality and inclusive design for all development and ensures that opportunities exist for people to be able to make healthier life choices and address health inequalities. The policies within the Brentwood Local Development Plan use both local and national evidence, strategy and policy with the aim to create and support strong, vibrant, sustainable and healthy communities. These include, but not limited to:
 - a. [SHMA 2016 Part 2](#) (evidence document number [C20](#)), which provides a detailed assessment of the housing required to meet existing and future needs across the borough; in doing so, it also examines the requirements of specific groups of the population;
 - b. The [Viability Assessment](#) (evidence document [C38](#));

- c. The Council's most up-to-date [Housing Strategy](#);
 - d. Essex County Council's Independent Living Programme, which encourages the provision of Specialist Residential Accommodation in Essex as a means to provide housing for people over the age of 55 whose current home no longer meets their needs;
 - e. [Essex Design Guide](#), which includes guidance on cross cutting themes, one of which is specifically in relation to the ageing population includes the principles of health and wellbeing. The Essex Design Guide encourages application of M4(2) and M4(3) standards in new development;
 - f. [Healthy Lives, Healthy People White Paper](#);
 - g. EPOA Guidance Note on Health Impact Assessment, which includes guidance for development to ensure that health and well-being impacts have been fully considered as part of the proposal;
 - h. The joint Essex health and wellbeing strategy 2018-2022, which identifies the following priorities:
 - (i) improving mental health and well-being;
 - (ii) addressing obesity, improving diet and increasing physical activities;
 - (iii) influencing conditions and behaviours linked to health inequalities; and
 - (iv) enabling and supporting people with long-term conditions and disabilities.
23. Paragraphs 6.5 to 6.14 of the [SHMA 2016 Part 2](#) considered in detail the likely future need for older people, both within general housing but also specialist accommodation. These results were calculated using the Housing Learning and Improvement Network' Strategic Housing for Older People tool (and the data within it in 2015), alongside the long-term balancing housing market model, which was utilised to profile the requirement for older persons households within the general housing. Two different scenarios are considered for the future requirement for specialist accommodation, based on different usage ratios. The results are disaggregated by tenure in tables 6.1 and 6.2.
24. In terms of specialist accommodation for older persons (as set out in Chapter 6 of the [SHMA 2016 Part 2](#), it is evidenced that in Brentwood an additional 123 affordable and 372 market sheltered and extracare housing units should be provided over the plan period.
25. The housing need for older and disabled people, the accessibility and adaptability of existing housing stock, how needs vary across tenures and the overall impact on viability have been considered and embedded throughout the Local Plan policies, in particular:
- a. Policy HP01: Housing Mix. This considers the accessibility and adaptability of housing stock for older and disabled people living at home, in both social rented and privately owned housing. Based on available evidence and best practice (such as recommendations from the Essex Design Guide), it requires that all new development of 10 or more homes to be built to M4(2) standard, and that 5% of new affordable housing on sites of 60 or more homes to be built to M4(3) standard (Please refer to the Council's answer to Inspectors' question 61).

Some development sites of 500 or more dwellings are also required to provide residential care homes (Use Class C2) where appropriate.

- b. Policy HP04: Specialist Accommodation. This seeks delivery of Specialist Accommodation. This form of accommodation includes, but is not limited to, housing for older people such as Independent Living schemes for the frail elderly, homes for those with disabilities and support needs, residential institutions and culturally appropriate accommodation for those Gypsies and Travellers or Travelling Showpeople who no longer exercise a nomadic lifestyle and where the Planning Policy for Traveller Sites does not apply. Further information is provided in the Council's answer to Inspectors' question 64.
- c. Policy HP05: Affordable Housing. This requires an affordable housing target of 35% on major developments and sets out an indicative size guide for Affordable Housing.
- d. Policy HP12: Planning for Inclusive Communities seeks to deliver well-designed housing which would be accessible and adaptable to meet people's changing needs and help to sustain independent living.
- e. Policy BE10: Connecting New Developments to Digital Infrastructure. This policy recognises the importance of digital connectivity, which could assist an ageing population and people living with dementia, by reducing isolation, promoting independent living and assisting and complementing care and support. Therefore, it requires provision for digital infrastructure in new developments to accommodate the shift towards digital healthcare.
- f. Site specific policies where relevant also require provision for residential care homes on site.

Viability assessment

- 26. All policies requirements in the Submission Local Plan, including the standards and housing mix requirements in Policies HP01 and HP06, have been viability tested to ensure that residential development is viable. The [Viability Assessment](#) (evidence document [C38](#)) demonstrates that these requirements in the Local Plan are achievable and the cumulative impact of policies in the local Plan will not put development at risk.
- 27. The modelling is based on the assumption (paragraph 8.11 of 2018 [Viability Assessment](#)) that all new homes (on sites of 6 or more units) be constructed to meet requirement M4(2) Accessible or Adaptable Dwellings and on sites of 20 or more units 5% of affordable should be built to meet requirement M4(3) Wheelchair User Dwellings. It is acknowledged that this assumption was based on the threshold previously introduced in the [Regulation 18 Draft Local Plan 2016](#) (evidence document [B9](#)); however, it is important to note that the uplift in thresholds (all sites of 10 or more to meet M4(2) and sites of 60 or more units to have 5% of affordable units to meet M4(3) standards) will result in an improvement in viability, but would not impact the overall viability test conclusion.
- 28. Tables 8.1 and 8.2 of the [Viability Assessment](#) set out the housing mix that were used in the modelling. These correspond to the mix set out in Policies HP01 and HP02.
- 29. It should be noted that where an applicant considers that it is not feasible or viable to meet the requirements such as set out in Policy HP01, the Council will expect this to be demonstrated

with robust evidence and may negotiate a proportionate housing mix which is achievable, account will be taken of the nature, constraints, character and context of the site.

INSPECTORS' QUESTION 64

What specialist accommodation provision will be sought on sites of 500 dwellings or more? Is the 5% requirement for self-build homes on these large sites justified? What is the justification for the 500 dwelling threshold? Will the amount of provision on such sites meet the identified needs for these forms of accommodation?

Specialist accommodation

30. Paragraph 61 of the NPPF states that “the size, type and tenure of housing needed for different groups in the community should be addressed and reflected in planning policies (including but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).” Footnote 26 confirms that “people wishing to commission or build their own homes” is in relation to the Self Build and Custom Housebuilding Act 2015.
31. Specialist accommodation does not necessarily have associated support requirements but could cater to the specific needs of the groups requiring it through the built form of the accommodation provided, such as purpose-built student accommodation or pitches for non-nomadic Gypsy and Travellers. Specialist accommodation therefore can fall within the C2, C3 or sui generis land use class.
32. The [SHMA 2016 Part 2](#) (evidence document number [C20](#)) and the [Gypsy and Traveller Accommodation Assessment](#) (evidence document number [C23](#)) forms the main Evidence Base for the Council’s assessment of specialist housing provision. These identified Specialist Accommodation requirements of the following groups in the Borough:
 - a. Older persons
 - i. In terms of the need for Residential Institutions (relates principally to a C2 use class and does not form part of the Borough’s overall housing need), the SHMA Part 2 identifies a long-term requirement for an additional 494 spaces within registered care to be provided between 2013-2033.
 - ii. In terms of specialist accommodation for older people (which form part of the Borough’s overall housing need and tend to fall within use class C3); the [SHMA 2016 Part 2](#) identifies a need for 123 affordable and 372 market and extra care houses to be provided between 2013-2033.

- iii. 5,000 new homes should be built to M4(2) accessible and adaptable standard over the remainder of the plan period (1,700 of to be within an affordable tenure and 3,300 as market accommodation) (as further explained under question 61).
- b. People with disabilities
 - i. It was forecast that the number of people aged 18-64 with a serious physical disability will increased by 8.8% from 2015 to 2030, those aged 65 or over with a long-term illness that limits them a lot is expected to increase by 40.6% in the same period.
 - ii. It is recognised that in addition to specialist accommodation, it is important to help people with disabilities to remain in their current home by providing support and adaptations.
 - iii. 525 homes built to the M4(3) wheelchair user dwelling standard should be made available by the end of the Plan period (as further explained under question 61).
 - c. People wishing to build their own homes
 - i. At the time the [SHMA 2016 Part 2](#) was undertaken, there were not sufficient data to indicate the demand for self building in the Borough; however, the Council's Self and Custom Build register since 2016 has informed the policies regarding Self and Custom Build. Please refer to the section below.
 - ii. Self and Custom Build properties can also be an opportunity to provide other form of Specialist Accommodation. This can include bungalows for people with limited mobility, smaller plots to provide opportunities for households seeking lower cost market housing and larger plots suitable for semi-detached properties to cater for extended families wishing to build together.
 - d. Gypsies, Travellers and Travelling Showpeople who meet the PPTS definition of 'travelling' as well as those who do not meet the PPTS definition but may be able to demonstrate a need for culturally appropriate accommodation under Equalities legislation.
 - e. Family households
 - f. It is noted that students and service personnel were considered, but there is no University or Ministry of Defence presence within Brentwood, so these groups have not been profiled in detail in the [SHMA 2016 Part 2](#).
33. Following these findings, sites of 500 dwellings or more are required to provide the following forms of Specialist Accommodation to meet the needs of the above groups, as set out in overarching policies and site-specific policies:
- a. For older people:
 - i. a number of sites are required to provide care homes (Use class C2) for elderly people (site Policy R02, R03, R04 & R05);
 - ii. all homes to be built to M4(2) accessible and adaptable standard (Policy HP01 Housing Mix);

- b. For people with disabilities: a minimum of 5% of new affordable dwellings to be built to the M4(3) wheelchair accessible dwellings standard (Policy HP01 Housing Mix);
 - c. For people wishing to build their own homes: 5% units for Self and Custom Build are required (Policy HP01 Housing Mix, site Policy R01, R02, R03, R04 & R05);
 - d. For Gypsies, Travellers and Travelling Showpeople: a minimum of 5 serviced Gypsy and Traveller pitches as part of the Dunton Hills Garden Village allocation (R01). For those who do not meet the PPTS definition but may be able to demonstrate a need for culturally appropriate accommodation, the Council will refer to the latest 'Specialist Accommodation Report' and evidenced local needs when application comes forward to secure a suitable amount of provision (Policy HP01 Housing Mix, HP04 Specialist Accommodation and HP11). This will allow for individual site circumstances and layout as well as the latest needs identified; and
 - e. For family households (this is a standard requirement regardless of size of development): all sites are required to provide a mix of dwelling types, sizes and tenures to meet the needs of family households with children; the Council will refer to the Indicative Size Guide for Market Housing (Policy HP01 Housing Mix and Figure 6.1 in the Submission Plan) to inform negotiations between the Council and developers.
34. Due to the variety of specialist housing and the wide range of needs the accommodation can cater to, the Council will advise on the final type, tenure and quantum of specialist accommodation required at the time an application is submitted; this will be secured through S106 or other legal agreements. The Council will refer to the latest 'Specialist Accommodation Report' during negotiations with developers in establishing local need and securing the provision. The SHMA Part 2 and the Brentwood Gypsy and Traveller Accommodation Assessment will be used alongside other relevant local evidence, such as Housing Strategy, to inform a Specialist Accommodation Report.

Is the 5% requirement for self-build homes on these large sites justified?

35. As set out in Policy HP01 and site-specific policies, to assist in the delivery of a choice of accommodation, the provision for 5% of self and custom housebuilding plots is required to be made available on strategic residential schemes of 500 dwellings or more. This requirement is in addition to other Specialist Accommodation provision (such as care homes and Gypsy and Travellers pitches).
36. The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) provides a legal definition of self-build and custom housebuilding. The Act does not distinguish between self-build and custom housebuilding and provides that both are where individuals, an association of individuals, persons working with or for individuals or associations of individuals, build or complete houses to be occupied as homes by those individuals.
37. The Self and Custom Housebuilding Act 2015 places a duty on the Council to keep a register of individuals, and associations of individuals, who are seeking to acquire self-build serviced plots of land in the Council's area for their own self-build and custom housebuilding. The register

provides information on the number of individuals and associations on the register; the number of serviced plots of land sought; the preferences people on the register have indicated, such as general location within the authority's area, plot sizes and type of housing intended to be built. Data collected from the Council's Self and Custom Build Register Data (see [Annual Monitoring Report: Housing Delivery](#), evidence document D4) so far suggests a modest level of interest in Self and Custom Build, as set out below.

38. It should be noted that the majority of this demand aspire to living in a 3-4+ bedroom detached house or bungalow.

	2015-2016	2016-17	2017-18	2018-19	Total
New entries on the Self and Custom Building Register	14	52	47	48	161
Preference for type of house					
Detached House / Detached Bungalow		89%	91%	89%	
Semi detached		5%	2%	6%	
Terrace		3%	0%	0%	
Other		3%	6%	4%	
Preference for the number of bedrooms					
1 bed		2%	0%	2%	
2 bed		3%	13%	9%	
3 bed		33%	32%	26%	
4+ bed		62%	55%	64%	
Preference for general location					
Town		54%	32%	34%	
Village		43%	19%	40%	
Rural		31%	45%	26%	
Other		5%	4%	0%	

39. When the Local Plan was published for the Regulation 2019 consultation, it was based on the available figures at the time; which equates an average of 37 new applications per year. However, since then, more data have become available suggesting an average of 40 new applications per year.

	2015-16	2016-17	2017-18	2018-19	Total	Average per annum, based on the most recent data
New entries on the Self and Custom-Building Register	14	52	47	48	161	40
% of people remained interest as of August 2020 (based on returned responses)	92%	86%	N/A	N/A	N/A	N/A

40. Based on this average per annum, this totals 680 applicants between 2016- 2033. Housing completions and outstanding commitments total 7,787 new homes (Policy SP02). When dividing the total number of applicants expected to join the register between the Plan period (680) by the 7,787 net new homes figure, this equates to a requirement for 8% of self-build and custom build homes.

Projection of new Self and Custom Building demands to be met during the Plan period	40 x 17 = 680
Housing completions and outstanding commitments	7,787
Total dwellings from sites of 500+ units	4,175

41. This justifies the 5% requirement for new homes to be in the form of self-build/custom build plots.

42. It is acknowledged that this is a conservative estimate of demand when taking into account the recent level of demand in the last two base periods.

43. Paragraph 6.11 supporting to Policy HP01 notes that the Council will refer to the Self and Custom Building Register to review the minimum 5% threshold at the time a planning application is submitted. This will allow for individual site circumstances and layout as well as the latest needs identified. As can be seen from the figures above a large proportion of needs identified on the register are for large individual plots which may not always be suitable on all sites.

44. To support the Local Plan, the requirement of 5% provision for self and custom housebuilding plots has been put through cumulative viability testing, taking into account all other Local Plan policy requirements on development viability in the area ([Viability Assessment](#), evidence document [C38](#)).

What is the justification for the 500-dwelling threshold? Will the amount of provision on such sites meet the identified needs for these forms of accommodation?

45. When the total number of applicants expected to join the register between the period 2016-2036 (680) are divided by the new local plan allocations that meet the 500 dwelling threshold in Policy HP01 (4,175), this produces a requirement for 16% self-build homes.
46. The 500 threshold has been viability tested and has shown to be deliverable alongside all other policy requirements.
47. Since submission of the Plan further years of data are now available for the self-build register which suggest a lower threshold would assist in meeting more of the identified self-build housing needs. When the calculation includes sites below the 100-dwelling threshold in Policy HP01, with the total number of applicants expected to join the register between the period 2016-2036 (680) are divided by the new local plan allocations that meet the threshold in Policy HP01 (5,534), this produces a requirement for 12% self-build homes.
48. It is considered that this threshold would more appropriately meet the updated projected needs therefore modification to the policy threshold would be appropriate, subject to viability testing.
49. Policy HP01 provides for a minimum 5% requirement on threshold sites to allow for individual site circumstances and layout. As can be seen from the figures, a large proportion of needs identified on the register are for large individual plots which may not always be suitable on all sites. It is however important to note that the 5% is a minimum and it is intended that the Council will review the % requirement on threshold sites set out in Policy HP01, at the time a planning application is submitted, as set out in paragraph 6.11 of the Plan. It is intended that the Council will use the latest information from the self-build and custom build register to determine the quantum and mix of self-build required at the point of application. The Council considers this approach to meeting the demand for self-build and custom housebuilding is justified and effective.
50. This is because it is recognised that preferences on the self-build register vary and will change over time. The Local Plan includes delivery monitoring requirements which will be collated, analysed and published on annual basis to assist in the delivery of this form of housing.
51. As set out in paragraph 6.28 of the Submission Local Plan, in monitoring of Local Plan polices, if a shortfall in provision is identified, the policy will be reviewed as necessary.