

15.03.1040



Local Plan  
Planning Policy and Programmes  
Warrington Borough Council  
New Town House  
Buttermarket Street  
Warrington  
WA1 2NH

**03.05.2019**

Dear Sir/Madam,

### **Warrington Proposed Submission Version Local Plan Consultation –**

This letter includes the formal comments from the National Custom & Self Build Association (NaCSBA) to Warrington's Proposed Submission Version of the Local Plan.

NaCSBA's mission is to substantially increase the number of people able to build or commission their own home and they believe that opportunities should arise for prospective self and custom-builders through the Local Plan process.

#### Custom & Self-Build

Current self-build policy in England has evolved over the last 4-5 years. Brandon Lewis MP, in his role as Minister of State for Housing and Planning made the following comments in a letter sent to all Local Planning Authorities in March 2015:

*"We all need to do more to address the lack of suitable plots of land being made available, and we believe that local planning authorities have a vital role to play.."*

The letter went on to say:

*"National planning policy and guidance is clear that local planning authorities should identify and plan for local demand for custom and self build housing. Planning inspectors will want to see evidence that consideration of demand for custom and self build housing has been taken into account when they examine Local Plans. Failure to provide sufficient evidence may lead to plans being found unsound."*

This communiqué from the Department of Communities and Local Government (now MHCLG) could not be any more explicit in its requirements for LPAs to plan for the needs of those that wish to build their own home. However, at the time, there were limited references within the NPPF and there was no adopted policy or legislation to support this.

The Self-build and Custom Housebuilding Bill, however, received Royal Assent on 26 March 2015. The Bill is now an Act of Parliament. This Bill seeks to establish a register of prospective custom builders who are seeking a suitable serviced plot of land and requires LPAs to keep an up to date register of people within the district that wish to build their own home. NaCSBA are

pleased to note that Warrington BC do keep a self-build register which prospective self-builders can sign up to via the council's website.

The above comments from the Planning Minister along with the *Right to Build* legislation clearly demonstrate how the government intended LPAs to respond to the requirements set out in the NPPF when drawing up new Local Plans. LPAs should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self-build need in their districts. And LPAs that do not do so can expect their Local Plans to be found unsound at examination.

The Housing and Planning Act 2016 conferred on LPAs the responsibility to:

*"Give suitable development permission in respect of enough serviced plots of land to meet the demand of for self-build and custom house building in the authority's area..."*

The Act established that evidence of such demand would be provided by registers which LPAs are required to keep in accordance with the 2015 Self-Build and Custom Housebuilding Act.

The Housing White Paper entitles 'Fixing Our Broken Housing Market' published in February 2017 stated that:

*"the Government wants to support the growth of custom built homes. These enable people to choose the design and layout of their home, while a developer finds the site, secures planning permission and builds the property."*

The paper further went on to acknowledge that:

*"The main barriers to custom built homes are access to land and finance."*

Finally, the paper demonstrated the importance with which the Government treats provision of self-build opportunities by councils by stating that:

*"If we do not believe local authorities are taking sufficient action to promote opportunities for custom-building and self-building, we will consider taking further action including possible changes to legislation."*

**Paragraph 61** of the revised National Planning Policy Framework (NPPF) sets out the requirement for Local Planning Authorities (LPA) to plan for a wide choice of high quality homes to support sustainable communities and provide greater opportunities for home ownership. It goes on to state (underlining is our emphasis):

*"The size, type and tenure of housing needed for different groups in the community should be assessed 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)."*

Furthermore, the NPPF makes clear how small and medium sized sites can make an important contribution to meeting the housing requirement of an area. The identification and promotion of small and medium sites as per the NPPF **paragraph 61** can be promoted in order to support the needs of custom and self-builders.

NaCSBA are pleased to note that the Proposed Submission Version Local Plan sets out it's stall to meet the needs of those wishing to build their own home in **Policy DEV2** by stating that the council will 'ensure sufficient supply of plots for self-build and custom-build housing to meet the identified need on the Council's register'.

The requirements in policies relating to the urban extensions and site allocations identified within the emerging plan for specific provision to be made for self-build/custom-build plots, subject to demand is also encouraging. NaCSBA do however have some concerns that the policies state that demand will be measured by the self-build register. Whilst it is noted that demand for Self-Build is hard to measure, in order for the self-build register to be any realistic indication of demand Warrington BC must ensure that the register is very well publicised. NaCSBA would suggest that further evidence as to the demand for self-build in the borough is required.

NaCSBA is content that due to the number of allocated sites identified within the plan on which self-build plots will be delivered, that further self-build policies will not be required to meet the needs of those wishing to build their own home. However, it is important that WBC do understand the level of demand so as not to underdeliver self-build opportunities on these sites.

### Recommendations

NaCSBA would like to make the following recommendations:

1. WBC should undertake work, outside of the self-build register, in order to understand the level of demand for self-build in the borough. This may include the production of a Housing Needs Survey focussed on custom and self-build.

Please contact me if you require any additional information.

Kind regards,



**Sally Tagg** MRTPI -Technical Representative On behalf of NaCSBA

(Managing Director of Foxley Tagg Planning)

*This representation has been prepared on behalf of NaCSBA and its supporters, who are listed overleaf and comprise businesses and organisations in the custom- and self-build sector.*



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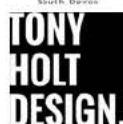
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