

From: [office](#)
To: [Strategy](#)
Subject: Foxley Tag Planning - Local Plan Issues and Options Response - NaCSBA
Date: 16 March 2020 16:35:57
Attachments: [image001.png](#)

Dear Sir/Madam,

Re: Somerset West and Taunton Local Plan 2040 Issues and Options

Please find attached a response to the Somerset West and Taunton Local Plan Issues and Options consultation on behalf of the National Custom & Self-Build Association.

If you have any questions regarding the attached representation then please do not hesitate to get in touch.

Kind regards,

Sally

Sally Tagg MRTPI
Managing Director

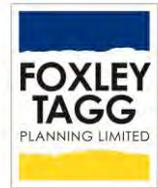
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15.03.1040



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16th March 2020

Dear Sir/Madam,

Re: Somerset West and Taunton Local Plan 2040 Issues and Options Consultation

This letter includes the formal comments from the National Custom & Self Build Association (NaCSBA) to the *Somerset West and Taunton Local Plan 2040 Issues and Options Consultation*.

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 custom and self-build (CSB) policy in England has evolved over the last 5 years with the Self-build and Custom Housebuilding Bill, receiving 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 Somerset West and Taunton Council do keep a self-build register which prospective self-builders can sign up to via the council's website.

The *Right to Build* legislation clearly demonstrates how the government intends for 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 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.

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:

“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.

Recent appeal decisions have highlighted and confirmed the weight that should be afforded to self-build as a material consideration in determining planning applications, which in turn demonstrates the importance of CSB in housing delivery. Examples of such appeal decisions include:

- A proposed development of up to 215 homes, public open space and associated infrastructure, which involved a significant custom build portion, at Land east of Park Lane, Coalpit Heath (APP/P0119/W/17/3191477). The Inspector noted that ‘there are three different components of the housing that would be delivered: market housing, affordable housing (AH) and custom-build housing (CBH). They are all important and substantial weight should be attached to each component’.
- Development of land for the provision of 22 custom/self-build dwellings with associated access, parking provision and amenity space at Land east of St Edmunds Lane, Great Dunmow (APP/C1570/A/14/2223280) in which the Inspector ‘afforded the provision of custom/self-build housing significant weight’ in their consideration of the appeal.

As a consequence of the policy and guidance outlined above, it seems clear that LPAs have a duty conferred upon them to actively meet the needs of those wishing to build their own homes.

Question 3d: Should we allocate sites and/or make sure a percentage of housing developments are for self-built plots for people wanting to build their own homes? Should we allow self-build plots on Rural Exceptions sites provided that they are affordable?

Paragraph 5.3.4 of the Issues and Options document acknowledges that the government expects the LPA ‘to give suitable permission to enough plots of land to meet the demand for custom self-build (CSB)’ and the LPA are of the view that they are currently delivering enough sites to comply with this.

Option 3d: Providing custom and self-build homes has four strands to it, which we will take in turn.

- i) *A positive encouragement policy, including for community-led projects, and leave the housing market to deliver plots as and when demand arises; and/or*

Whilst NaCSBA agree that custom and self-build should be encouraged, as should community projects, this is not sufficient to discharge the LPA’s duty towards those wishing to build their own homes. Many LPAs include ‘encouragement’ policies which simply state that ‘where a proposal is in line with other policies within the LP, custom and self-build proposals will be supported’.

However, given that proposals that are in line with other LP policies will be compliant with the Local Plan, they would be supported regardless. As such, although we welcome the encouragement, it is not adding anything to the LP and on its own it is not sufficient.

- ii) Identify and allocate specific sites for self-build plots in locations related to where people want to live according to our self-build register; and/or*

NaCSBA wholeheartedly support the proposal to allocate sites specifically for custom and self-build. It is considered that this is one of the most desirable and effective means of delivering self-build opportunities for a number of reasons. Firstly, being allocated for CSB gives a site the strongest possible chance of actually being built out for custom and /or self-build. By allocating small-scale SCB sites, LPAs can deliver the sorts of CSB opportunities that prospective self-builders want to build on – it is known that prospective custom and self-builders do not normally want to build their own home on a large estate. It is considered that CSB sites of up to 20 plots will normally be quite attractive to those wishing to build their own home. Lastly, the mechanism gives LPAs control over where CSB should be built, enabling extra control over the design process, which can be further augmented by the use of plot passports.

- iii) Include a requirement for all housing development sites over a threshold to include a proportion of plots as self-build plots; and/or*

Whilst NaCSBA understand the theory behind such a proposal, ultimately this leads to CSB plots in the types of locations (i.e. large housing estates) that they do not wish to build on. The vast majority of those that wish to build their own home wish to do so in an attractive rural or semi-rural location, on a single plot or small site, not on a large estate with tens or even hundreds of other homes. Whilst a 'proportion of plots on large sites' policy could be part of a wider solution, it should not be considered as the main or sole mechanism for delivering opportunities for those that wish to build their own home.

- iv) Allow self-build plots on Rural Exception sites provided that they are secured as affordable housing in perpetuity.*

NaCSBA support this proposal in principle, however it should be acknowledged that it should not be expected that such a mechanism would deliver a large number of homes. The number of people in housing need, wishing to build their own home, but willing to accept that home be capped in sale value once completed is considered to be very low indeed.

NaCSBA would like to see single CSB plots permitted on sites, outside settlement boundaries, but which are well-related and sustainable.

Overall, NaCSBA would like to see a policy promoting CSB which:

- Supports custom and self-build where a proposal is compliant with other policies within the plan; *and*
- Supports small-scale CSB on sustainable sites outside but adjacent to existing settlement boundaries.
- Allocation of small-scale sites (up to 20) specifically for custom and self-build; *and*

NaCSBA would discourage the use of a percentage on large sites policy as, although this might seem like an easy way to ensure delivery of CSB plots, there is likely to be little demand for

them. As such, the LPA would be failing to discharge its duty to those wishing to build their own home, unless the policy was paired with the bullets above.

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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